

TYPE APPROVAL AUTHORITIES MEETING

6 & 7 DECEMBER, 2012 – BRUSSELS, BELGIUM

25-2-2013

Mobilit

Author:

TAAM MINUTES

AGENDA:

- 1. Opening of the meeting**
- 2. Adoption of the Agenda**
- 3. Adoption of the minutes from Bratislava**
- 4. Follow up on actions from the previous meetings**
 - 4.1. Bratislava Agenda item 3.2, TAAM Minutes forwarding to the Commission and TAAEG
 - 4.2. Bratislava Agenda item 4.1, Geneva Agenda item 4.8, Riga Agenda item 5.24: ECE R13: R13 test reports according annexes 19-21 (Germany)
 - 4.3. Bratislava Agenda item 4.3, Geneva Agenda item 5.5: ECE R103 and Regulation (EC) 715/2007: Replacement pollution control devices, Particulate filters Provisions for testing (Germany)
 - 4.4. Bratislava Agenda item 4.4, Geneva Agenda item 5.6.: Regulation (EC) 715/2007 and ECE R83.06: Engine setting for Type I test (UK)
 - 4.5. Bratislava Agenda item 4.6, Geneva Agenda item 8.2.: Final guidelines of the Multi-Stage Subgroup for the Processing of Multi Stage Approvals (Germany)
 - 4.6. Bratislava Agenda item 5.6, Directive 2007/46/EC: Mobile Air Conditioning for Special Purpose Vehicle (UK)
 - 4.6.1. Letter to European Commission: Application of the Directive 2006/40/EC for Special Purpose Vehicles of category M1
 - 4.6.2. Answer of the European Commission – Note for the file Review of the provisions on special purpose vehicles (SPV) (EC)
 - 4.7. Bratislava Agenda item 5.17, ECE R7: Front and rear position lamps (Poland)
 - 4.8. Bratislava Agenda item 5.21, Directive 97/27/EC: Determine the technically permissible maximum laden mass and category for trailers (Estonia)
 - 4.9. Bratislava Agenda item 5.26, Directive 2007/46/EC, ECE R107: Exits (UK)
- 5. Items relating to Framework Directive 2007/46/EC (Motor Vehicles)**

NEW ITEMS:

- 5.1. Unclear Transitional Provisions of ECE-R 13H up to Supplement 13 (Germany)
- 5.2. Installation of lighting and light-signalling devices – ECE R48.05
Dipped-beam headlamps switched ON and OFF automatically (Netherlands)
- 5.3. warning light according R65 on a 'complete' vehicle (Netherlands)
- 5.4. Regulation 48 (UK)
- 5.5. Type-approval mark requirement in directive 2009/59/EC (Finland)
- 5.6. Reg (EU) 678/2011 and log transporters (Germany)
- 5.7. SG, special purpose vehicle (Netherlands)
- 5.8. Criteria for category 'SG' vehicles (Sweden)
- 5.9. Coupling & Trailer Approval (France)
- 5.10. ECE R55 Mechanical Couplings – Castor Trailers (UK)
- 5.11. EC type-approval for mechanical coupling device exclusively designed to be installed on WVTA without towing mass capacity. How to proceed (registration, ...) when this coupling device is fitted to a vehicle? (Belgium)
- 5.12. Regulation (EU) 582/2011, alternative use of OBD-System for EURO 6 LDV (Germany)

- 5.13. Monitoring of DPF (A or B in the approval number) 595/2009/EC as amended by 64/2012/EC (Netherlands)
 - 5.14. Use of ECO tyre pressure (Netherlands)
 - 5.15. Deviation from NEDC shift points in favour of “start/stop” systems during idling (Netherlands)
 - 5.16. IUPR monitors to be declared by vehicle manufacturer (Netherlands)
 - 5.17. Rounding of Pn on Type Approval Certificate (Netherlands)
 - 5.18. MAC Directive 2006/40/EC New Information after Real-Life tests by a manufacturer (Germany)
 - 5.19. 2007/46 – Article 3 (UK)
 - 5.20. EC Regulation 715/2007 and 692/200 as amended by EU Regulation 630/2012 (UK)
 - 5.21. Are ranges allowed on COC masses and dimensions data for extendible and modular trailers? (Belgium)
 - 5.22. TAA Meeting on Conformity of Production procedures (Finland)
 - 5.23. Repair-and-Maintenance-Information, RMI-subgroup (Germany)
 - 5.24. 2007/46 – Annex 1 (UK)
 - 5.25. Technically permissible maximum laden mass (Sweden)
 - 5.26. Multistage EC type-approval after 29 Oct 2012 on base WVTA not amended by 678/2011/EC. Meet regulation 678/2011/EC or not? (Belgium)
 - 5.27. Worst-case description in test reports (Germany)
 - 5.28. 630/2012/EC (UK)
 - 5.29. N3 vehicle as lorry BA AND tractor BC. How should its COC be composed? (Belgium)
 - 5.30. Directive 76/114/EEC and Regulation 19/2011 (Lithuania)
6. Other
- 6.1. Presentation by representatives of Japan (Japan)
 - 6.2. Presentation by Germany (6/12/2012) Concerning a special lamp – direction indicator which runs from left to right (Germany)
 - 6.3. Plastic Glazing (UK)

General remarks: TAAM meeting will begin at 9 and Thursday noon sandwiches will be provided.
 Friday noon also sandwiches
 Friday afternoon visit to Autoworld for those who are interested

Next TAAM will be in Luxembourg
 For the second half of 2013 we still need a candidate to host – hopefully we’ll find a host by the next TAAM

MEETING QUESTIONS AND NOTES

1. Opening of the meeting

TAAM Minutes:

The delegates were welcomed to Brussels by [redacted] who also chaired the meeting.

2. Adoption of the Agenda

TAAM Minutes:

The proposed meeting Agenda was accepted with the addition of two items:

- Agenda item 6.2 : Directive 76/114/EEC and Regulation No.19/2011 – Lithuania 1
- Agenda item 6.3 : Reconfirmation of Riga Agenda item 5.27, ECE R43 – requirements for plastic glazing not used for driver's field of view – UK 7.

3. Adoption of the minutes from Bratislava

TAAM Minutes:

GER asks for the adoption of the agenda from the previous TAAM meeting held in Bratislava, Slovakia on 26-27 April 2012.

Remarks from several members were put in the final version.

4. Follow up on actions from the previous meetings

4.1. Bratislava Agenda item 3.2, TAAM Minutes forwarding to the Commission and TAAEG

TAAM Minutes:

Germany noted that there is a TAAM.eu website, but this is property of a private company. Maybe a chance to buy this website to use this in the present. Could be a possibility to use the fees of the ETAES.

Question now is if we want to buy the website.

UK doesn't see the need to buy this website. They can put this on their own website.

Germany wants to add this in the Bratislava minutes. Maybe it's better to come back to the agenda item 3

4.2. Bratislava Agenda item 4.1, Geneva Agenda item 4.8, Riga Agenda item 5.24: ECE R13: R13 test reports according annexes 19-21 (Germany)

TAAM Minutes:

The issue of the test reports is transmitted to AMEVSC (GRRF 73) where Mr Loccufier is the chairman.

4.3. Bratislava Agenda item 4.3, Geneva Agenda item 5.5: ECE R103 and Regulation (EC) 715/2007: Replacement pollution control devices, Particulate filters Provisions for testing (Germany)

TAAM Minutes:

he has to recheck this item, because he wasn't at the Bratislava meeting. He'd like to postpone this. Maybe it can be discussed together with the new question which is going about this topic.

4.4. Bratislava Agenda item 4.4, Geneva Agenda item 5.6.: Regulation (EC) 715/2007 and ECE R83.06: Engine setting for Type I test (UK)

TAAM Minutes:

About pollution

UK: nothing to add today => next TAAM

4.5. Bratislava Agenda item 4.6, Geneva Agenda item 8.2.: Final guidelines of the Multi-Stage Subgroup for the Processing of Multi Stage Approvals (Germany)

TAAM Minutes:

This was discussed at the TAAV?

In Annex 11 a new group in the Commission will discuss this.

Germany: leave it as an information point on the agenda so we can give some extra information to the Commission, concerning the status

4.6. Bratislava Agenda item 5.6, Directive 2007/46/EC: Mobile Air Conditioning for Special Purpose Vehicle (UK)

4.6.3. Letter to European Commission: Application of the Directive 2006/40/EC for Special Purpose Vehicles of category M1 (Jean Philippe)

4.6.4. Answer of the European Commission – Note for the file Review of the provisions on special purpose vehicles (SPV) (EC)

TAAM Minutes:

(Austria) and Netherlands: this topic was discussed in the informal group The letter 'X' is changed by 'G' for M1 above 2,5 ton

France: point still has to stay open, what with the vehicles under 2,5 ton

Netherlands: Commission said that under the 2,5 ton it is X

Chairman: We need to have a follow-up

4.7. Bratislava Agenda item 5.17, ECE R7: Front and rear position lamps (Poland)

TAAM Minutes:

This is difficult, even the experts (in Geneva) get lost. We need more time to solve this problem.

According R48:

These kind of lights could be seen on vehicles in use.

We can give an homologation to the light, but not an homologation of the car equipped with this light.

We have to leave this topic to Geneva and not discuss this in TAAM for the moment

4.8. Bratislava Agenda item 5.21, Directive 97/27/EC: Determine the technically permissible maximum laden mass and category for trailers (Estonia)

TAAM Minutes:

In the minutes of Bratislava, it says that this topic should be discussed in the Masses and Dimensions group => Chairman asks if this group exists

Maximum mass of trailer O1

Estonia: max mass, technically maximum laden mass cannot be more than 750kg.

Therefore O1 cannot exceed 750kg

This point is already discussed in Brussels

Chairman: maybe we should wait to see the new regulation before we can discuss this.

OK for the group

4.9. Bratislava Agenda item 5.26, Directive 2007/46/EC, ECE R107: Exits (UK)

TAAM Minutes:

UK: no feedback for the moment, wait for the next TAAM

5. Items relating to Framework Directive 2007/46/EC (Motor Vehicles)

NEW ITEMS:

5.1. Unclear Transitional Provisions of ECE-R 13H up to Supplement 13 (Germany)

backup:

- 12.1. Until 24 months after the date of entry into force of Supplement 5 to the original version of this Regulation, Contracting Parties applying this Regulation may continue to grant ECE approvals to the un-amended Regulation. (until 10.11.2009)
- 12.2. As from 1 November 2011, Contracting Parties applying this Regulation may refuse to grant national or regional type approval if the vehicle type does not meet the requirements of this Regulation as amended by Supplement 9 or Supplement 10 or Supplement 11 and is not fitted with an Electronic Stability Control System and a Brake Assist System, both meeting the requirements of Annex 9 to this Regulation.
- 12.3. As from 1 November 2013, Contracting Parties applying this Regulation may refuse first national registration of a vehicle which does not meet the requirements of this Regulation as amended by Supplement 9 or Supplement 10 or Supplement 11 and is not fitted with an Electronic Stability Control System and a Brake Assist System, both meeting the requirements of Annex 9 to this Regulation.
- 12.4. As from the official date of entry into force of Supplement 9 to the original version of this Regulation, Contracting Parties applying this Regulation:
 - (a) shall not refuse to grant approval under this Regulation to a vehicle complying with the requirements as amended by Supplement 9 to the original version of this Regulation.
 - (b) shall refuse to grant approval under this Regulation as amended by Supplement 7 to the original version of this Regulation.
- 12.5. Contracting Parties applying this Regulation shall continue to grant approvals to those types of vehicles which comply with the requirements of this Regulation as amended by Supplement 6 to the original version of this Regulation. (this paragraph has not been deleted up to now)
- 12.6. As from the official date of entry into force of the Supplement 11 (**30 January 2011**) to the original version of this Regulation, no Contracting Party applying this Regulation shall refuse to grant ECE approval under this Regulation as amended by Supplement 11.

- 12.7. Contracting Parties applying this Regulation shall continue to grant approvals to those types of vehicles which comply with the requirements of this Regulation as amended by Supplement 10 to the original version of this Regulation during the 36 months period which follows the date of entry into force of Supplement 11. **(until 29.01.2014)**
- 12.8. As from the official date of entry into force of the Supplement 12 to the original version of this Regulation, no Contracting Party applying this Regulation shall refuse to grant approval under this Regulation as amended by Supplement 12 to the original version of this Regulation. **(28.10.2012)**
- 12.9. Contracting Parties applying this Regulation shall continue to grant approvals to those types of vehicles which comply with the requirements of this Regulation as amended by Supplement 11 to the original version of this Regulation during the 12 month period which follows the date of entry into force of supplement 12 to the original version of this Regulation. **(until 27.10.2012)**
- 12.10. Contracting Parties applying this Regulation shall not refuse to grant extensions of approval according to this Regulation as amended by Supplement 11 to the original version of this Regulation.

Entry into force of supplement 13 was on **13.10.2013**

Requirements 1:

According to the above mentioned transitional provisions, type approval for a new vehicle type with regard to the braking system may only be granted for vehicles which fulfil the requirements of supplement 13 (including 12 since 29.10.2010 which refers to the marking of brake disks and drums).

For the time between 13.10.2012 (entry into force of supplement 13) and 27.10.2012 the supplements 11 and 12 has not been mandatory but supplement 13 was.

Question 1:

Is it possible to grant a type-approval for supplement 13 to ECE-R 13H expressly excluding the requirements of suppl. 11 and 12?

Possible solutions:

Type approving authority "e"	1
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Selection of solution		accepted	refused
A	Yes it is possible, according to the transitional provisions under 12.7 and 12.9	X	
B	No, it is not possible to exclude earlier supplements of a regulation even if the transitional provisions for this earlier suppl. would allow so		X

Comment:

KBA did already grant approvals according to suppl. 13 without the marking of brake disks according to suppl. 12 before the date when suppl. 12 becomes mandatory.

Requirements 2:

Since the transitional provisions in paragraph 12.5 and 12.7 has not been deleted according to later supplements, one could think that it is still possible to grant approvals for new vehicle types according to supplement 6 without taking into account all later supplements and also to supplement 10 until 29.01.2013!

Question 2:

Is it possible to grant a type-approval for supplement 6 or 10 to ECE-R 13H expressly excluding the requirements of all later supplements?

Possible solutions:

Type approving authority "e"	1
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Selection of solution		accepted	refused
A	Yes it is possible, according to the transitional provisions under 12.5 and 12.7		
B	No, it is not possible because later supplements become mandatory due to their own transitional provisions		
C	Other solution		

Comment:

The "**General Guidelines for UN regulatory procedures and transitional provisions in UN Regulations**", ECE/TRANS/WP.29/1044/rev1, namely para. C.30, reads:

"Unless specifically foreseen otherwise, extensions of existing approvals may continue to be granted on the basis of the provisions valid at the time of the original approval"

Therefore it should be possible to grant extensions for approvals with earlier supplements!

TAAM Minutes:

Poland: this issue was already raised at GRRF concerning transitional provisions Germany is aware of these documents, but they haven't heard about the outcome of the discussion

Poland: correct, there was no out coming opinion. Maybe the next meeting

UK: there are 2 paragraphs which conflicts (12.2 and 12.5). Maybe there is a difference in consolidation. We have to examine which consolidation is correct. UK will look this up and inform us.

Germany: document made in GRRF, causes confusion
 We need feedback of GRRF in January – Poland will ask this in GRRF
 UK is president of that meeting, UK will also pass this on. Germany will also take contact for this.

5.2. Installation of lighting and light-signalling devices – ECE R48.05

Dipped-beam headlamps switched ON and OFF automatically (Netherlands)

Issue	:	6.2.7.5	Dipped-beam headlamps may be switched ON or OF automatically. However, it shall be always possible to switch these dipped-beam headlamps ON and OFF manually.
		6.2.7.6.	If daytime running lamps are present and operate according to paragraph 6.19., either
		6.2.7.6.1.	The dipped-beam headlamps shall be switched ON and OFF automatically relative to the ambient light conditions (e.g. switch ON during night time driving conditions, tunnels, etc.) according to the requirements of Annex 12; or
		6.2.7.6.2.	Daytime running lamps operate in conjunction with the lamps listed in paragraph 5.11. where, as a minimum requirement, at least the rear position lamps shall be activated; or
		6.2.7.6.3.	Distinctive means are provided to inform the driver that the headlamps, position lamps and if so equipped end outline marker lamps and side marker lamps are not illuminated. Such means are:
		6.2.7.6.3.1.	Two distinctly different levels of instrument panel illumination intensity are provided during night and day, indicating to the driver that the dipped beam headlamps shall be switched ON; or
		6.2.7.6.3.2.	Non-illuminated indicators and identification of hand controls that are required by Regulation No. 121 to be illuminated when the headlamps are activated; or
		6.2.7.6.3.3.	A tell-tale visual, auditory or both, shall be activated only in reduced ambient lighting conditions as defined in Annex 12 to inform the driver that the dipped beam headlamps should be switched ON. Once the tell-tale is activated, it shall only be extinguished when the dipped beam headlamps have been switched on or the device which starts and/or stops the engine (propulsion system) is set in a position which makes it impossible for the engine (propulsion system) to operate.
		6.2.7.7.	Without prejudice to paragraph 6.2.7.6.1., the dipped-beam headlamps may switch ON and OFF automatically relative to other factors such as time or ambient conditions (e.g. time of the day, vehicle location, rain, fog, etc.).
		<u>Conclusion:</u>	
		If daytime running lamps are present and operate according to paragraph 6.19. the vehicle shall comply with the requirements mentioned in one of the paragraphs 6.2.7.6.1., 6.2.7.6.2. or 6.2.7.6.3..	

Question : Must the requirements mentioned in paragraph 6.2.7.6.1., i.e. the dipped beam headlamps shall be switched ON and OFF automatically, be fulfilled independently from the position of the master lighting switch, i.e. must the requirements also be fulfilled when the switch is in position "0" or "⤵" and not only in the position "AUTO" when available?

Solutions	A	Yes, the requirements of paragraph 6.2.7.6.1. must be fulfilled independently from the position of the master lighting switch, i.e. the requirements must also be fulfilled when the switch is in position "0" or "⤵".	
	B	No, the currently in many vehicle types fitted master lighting switch with position "AUTO" where the dipped-beam headlamps only switch ON and OFF automatically to the ambient light conditions is acceptable for fulfilling the requirements of paragraph 6.2.7.6.1..	

Decision	Type Approval Authority e/E		4
	Solution	Accepted	Refused
	A		X
	B	X	

TAAM Minutes:

Netherlands: concerning dipped-beam headlamps, for them it is NOT necessary that the automatic switching works in the OFF and ON position, only in the AUTO mode

UK, Spain and Belgium supports Netherlands (B-solution)

Result: everybody supports B

5.3. warning light according R65 on a 'complete' vehicle (Netherlands)

Directive or Regulation number:

76/756/EC ECE R48

Subject:

Is it allowed to have a warning light according R65 on a 'complete' vehicle covered by 2007/46?

Reference to Annex, etc in the Directive or Regulation:

2007/46 Annex IV and R65

Text:

R48

5.22. With the exception of retro-reflectors, a lamp even bearing an approval mark is deemed not to be present when it cannot be made to operate by the sole installation of a light source and/or a fuse.

76/756/EC

3. Without prejudice to the requirements of Article 8(2)(a) and (c) and (3) of Directive 70/156/EEC, of this Annex and to any requirements in any of the separate directives, the installation of any other lighting or light-signalling device than those defined in paragraph 2.7 of UN/ECE Regulation No 48 is prohibited.

A warning light according to R65 is no mandatory or optional light according 76/756 / R48. It has no individual specification according 76/756 / R48. According to R48 other lightning than specified are not allowed.

Although amber warning lights are common, they aren't allowed to be installed on vehicles covered by a complete WVTA

Question:



Solutions:

A	No, it isn't allowed to have an additional R65 warning light	
B		Yes, it is allowed to have an additional warning light according to R65

Decision:

<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A		
B		

TAAM Minutes:

Netherlands: Is it allowed to grant an approval for a warning lamp according R65 on a complete vehicle?

Austria: in AT no problem for the amber warning light, the blue light is restricted for the police and other public services

Conclusion is that it should be restricted to the amber warning light, blue should be prohibited except on police and ambulance vehicles

Germany (Frank): Geneva has to look at it. This should be regulated nationally.

France: Not possible to grant a WVTA, an approval according ECE Regulation, but on national base it should be possible

UK: solution A, national approval, not WVTA

Austria: we don't accept blue lights on normal vehicles, having vehicles with a national approval for blue lights, they don't want to accept those. They are a bit worried about this.

Conclusion: WVTA is not good, but possible with remark that lamps are available, but disabled.

Ask Geneva for a point of view about this topic

5.4. Regulation 48 (UK)

h have approved
the number plate

**7/R4) which when
ove the same**

Option	Possible Solution	Comments
A	Yes it is possible to approve a combined lamp as the individual regulations are tested separately	
B	No it should not be possible to approve a combined lamp which when illuminated gives the impression of having two position lamps	
C	Yes it is possible to approve this type of combined lamp to R48	
D	No it is not possible to approve this type of combined lamp to R48	

TAAM Minutes:

Belgium: rear registration lamp works as a position lamp as well

UK: is it possible for vehicles less than 1,8m to have 2 visible red light sources

Spain: yes for the first question, it should be possible to approve according R7. For the second question, the installation is not possible to approve

Conclusion: The component can be approved, but not the installation

5.5. Type-approval mark requirement in directive 2009/59/EC (Finland)

COUNTRY: Finland

QUESTION NR.: 1

SUBJECT: Type-approval mark requirement in directive 2009/59/EC (codification of 74/346/EEC)

REFERENCES (DIRECTIVE/ANNEX/ETC):

Directive 2009/59/EC on rear-view mirrors for wheeled agricultural or forestry tractors

2.1.1. Tractors may be fitted with rear-view mirrors of classes I and II only bearing the EC type-approval mark laid down in Directive 2003/97/EC of the European Parliament and of the Council of 10 November 2003 on the approximation of the laws of the Member States relating to the type-approval of devices for indirect vision and of vehicles equipped with these devices, amending Directive 70/156/EEC and repealing Directive 71/127/EEC (1).

EC regulation 661/2009 (GSR), Article 19

1. Directives... 2003/97/EC shall be repealed with effect from 1 November 2014.
3. References to the repealed Directives shall be construed as references to this Regulation.

QUESTION/PROBLEM/CONCERN:

New component type approval according to directive 2003/97/EC cannot be granted after 1.11.2012 (GSR, article 13, point 2). The Framework directive 2003/37/EC does not list UN/ECE regulation 46 as an alternative to 74/346/EEC (codified with 2009/59/EC). This leads to situation in which the new EC type approval cannot be granted and mirrors bearing UN/ECE Regulation 46 type approval mark are not mentioned in directive 2009/59/EC.

1. Should the reference to the directive 2003/97/EC be construed as a reference to the GS regulation and therefore to UN/ECE Regulation 46 after 1.11.2012?

2. May tractors be fitted with rear-view mirrors bearing the UN/ECE Regulation 46 type-approval mark after 1.11.2012?

1. Please consider the following options A and B:

		e17	
		Accepted	Refused
A	Yes	X	
B	No		X

2. Please consider the following options A and B:

		e17	
		Accepted	Refused
A	Yes	X	
B	No		X

TAAM Minutes:

It concerns rear-view mirrors on tractors

2 questions

2003/97/EC doesn't make reference to the UN/ECE Regulation

Should we be able to fit tractors with rear-view mirrors with UN/ECE approval

Germany agrees with this point of view

UK can accept this, but wants to let to discuss in Brussels

Netherlands and Belgium agrees also with regulation 46

Conclusion: 1A, 2A

5.6.Reg (EU) 678/2011 and log transporters (Germany)

Requirement

Annex II of 2007/46/EC amended by EU-Regulation No. 678/2011 makes a statement to tractors (code BC) in part C, pos. 3.3:

“a towing vehicle which is designed and constructed exclusively or principally to tow semi-trailers;”
while semi-trailers (Code DA), part C, pos. 4.1 are:

“a trailer which is designed and constructed to be coupled to a tractor unit or to a converter dolly and to impose a substantial vertical load on the towing vehicle or on the converter dolly.”

However, the next sentence implies that only one kind of coupling is admissible:

“The coupling to be used for a vehicle combination shall consist of a king pin and a fifth wheel.”

Question

A usual log transporter concept is a tractor-trailer combination, in terms of 97/27/EC. The coupling having similar properties like a king pin and a fifth wheel is entirely part of the towing vehicle and as the logs make an integral part of the “semi-trailer” coupling is done as the logs are clamped into a U-shaped retainer, thus held in place greatly by friction.

If the last sentence of 4.1 is understood to be merely explanatory this remains to be a tractor-semi-trailer combination, but what is it if it should be a requirement?

If it should be deemed to be a combination of truck and trailer

- the static load of the trailer on the towing vehicle makes it also difficult to classify the trailer,
- compatibility bands to braking are different and
- the combination overall length is allowed to be greater than that of a tractor-semi-trailer-combination.

Possible solutions: A

Type approving authority "e"	1
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Selection of solution		Yes	No
A	A log transporter of this kind is a tractor-trailer-combination. The last sentence to pos. 4.1 is just explanatory	X	
B	A log transporter of this kind is not a tractor-trailer-combination. The last sentence to pos. 4.1 is a requirement. This combination is a		X

TAAM Minutes:

Germany: combination of the 2 vehicles act as a tractor- semi-trailer

It makes it difficult to classify the trailer. Prefer solution A

UK: solution A is the best in this kind of situation

France: would it be possible to approve this kind of coupling according to R55?

Germany: not sure

Poland: This kind of question was already asked several years ago. The problem is still not solved. There was no solution. This is a dangerous situation, so it cannot be seen as a combination

Belgium: how can this be tested? Concerned for the coupling

Poland: Postpone this subject to the next TAAM meeting, look up by then what is going on the road

Germany (Sven): a tractor shall have a kingpin. Is this vehicle a tractor or is it a lorry?

How can we approve the entire combination? This is in discussion in the special vehicles group in Brussels.

Ask it to the experts and by the next TAAM meeting discuss their opinion
 Netherlands: this should be discussed in the special vehicles group
 UK: We understand the concern of Poland. Maybe an alternative proposal C: every member state may handle this on national base.
 Germany: If you say this is a normal truck, than it has to be tested as a truck, but we don't see this as a normal truck. Keep it to the special vehicle group is a good idea and also keep it on a national base. Maybe finding a solution on the next TAAM meeting.
 Austria: vehicle is truck, trailer without coupling device. This kind of coupling device is not able to be approved
 Spain: National base, this vehicle is a tractor
 Chairman: make it more complex: it is a tractor, but also a truck. It should be discussed as special purpose vehicle
 Germany: agree with Spain, approve as semi-trailer tractor, than approve as a second stage having this fixture on the vehicle.
 Chairman: we will not get an answer to this topic today, maybe for the next TAAM

5.7.SG, special purpose vehicle (Netherlands)

Text:

5.8. Special group: SG, a special purpose vehicle which does not enter in any of the definitions mentioned in this section.

Question:

In Annex II, Part A, paragraph 5 there are several well defined special purpose vehicles. The group at point 5.8 is not so well defined which vehicles belongs to this group of special purpose vehicles.

It can be interesting for manufacturers to define their their vehicle as a special purpose vehicle. Special purpose vehicles don't have to comply with EVSC, LDWS, AEBS, etc.

Can a street sweeper be considered as a special purpose vehicle?

Solutions:

A	Yes	This is a very specific vehicle with specific use which should be covered in the SG group
B	No	This is a normal truck (N2) and should not be considered as a special purpose vehicle

Decision:

<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A	X	
B		X

Authority:

Type approval Authority e/E	4
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TAAM Minutes:

Netherlands: some SG are not well defined, what can be seen as special purpose vehicle.

Can a street sweeper be considered as a special purpose vehicle, according Netherlands yes

Luxembourg: yes

France: what is the definition of a special purpose vehicle. Every lorry can have this system. Do they all have to be seen as special purpose vehicle. Could it fulfill all the requirements of annex 4. France is not convinced that this is a special purpose vehicle. Maybe also discussing this in the special purpose vehicle

Poland: it is not mentioned to carry goods, so it cannot be seen as a normal truck, so this should be seen as a special purpose vehicle

Estonia or Lithuania??: not a special purpose vehicle

France: it fulfills annex 4 so we don't need to put in in annex 11

Netherlands: next point of Sweden gives the definition of special purpose vehicle. So this can be seen as a SPV

UK: they look at the following: do they have special equipment

France: discuss this in the SPV group. What is the clear definition of SPV.

They allow SPV to ride on Sunday, other vehicle type not. A sweeper may ride on Sunday and that's why they look at it as an SPV

Finland: next question of Sweden is talking about the same topic, maybe combine them. They follow the German point of view. OK, we will combine the 2 questions. Sweden is not present (problems with the weather)

5.8. Criteria for category "SG" vehicles (Sweden)

SUBJECT: Criteria for category "SG" vehicles

DIRECTIVE: 2007/46/EC

RELEVANT SECTION:

Annex II: introductory part item 3, part A item 2.2 and part A section 5

Annex XI: appendix 4

Concern:

With regard to new regulations becoming mandatory for type-approvals of new types and where SPV's are exempted from the scope, e.g. AEBS starting from 1st November 2013, there is an interest from manufacturers to inform themselves about criteria to categorise a vehicle as "SG".

Annex II:

3. Categorisation into vehicle categories

3.1. The manufacturer is responsible for the categorisation of a type of vehicle into a specific category.

For such purposes, all the relevant criteria described in this Annex shall be met.

3.2. The approval authority may request from the manufacturer appropriate additional information with the aim of demonstrating that a vehicle type needs to be categorised as special purpose vehicle in the special group ('SG Code').

Part A:

2.2. Special purpose vehicles

2.2.1. 'Special purpose vehicle (SPV)' means a vehicle of category M, N or O having specific technical features in order to perform a function which requires special arrangements and/or equipment.

For incomplete vehicles that are intended to fall into the SPV subcategory, the letter 'S' shall be added as suffix to the letter and numeral identifying the vehicle category.

The various types of special purpose vehicles are defined and listed in Section 5.

Section 5:

5.8. Special group	SG	a special purpose vehicle which does not enter in any of the definitions mentioned in this section.
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Annex XI:

Appendix 4

Other special purpose vehicles (including trailer caravans)

Application of the exemptions is only permitted if the manufacturer demonstrates to the satisfaction of the approval authority that the vehicle, due to the special function, cannot meet all the requirements.

As an example:

A refuse collection vehicle or, "garbage disposal truck", is, based on Annex II, categorised as a "N" vehicle with body-work code "BA18". Could such a vehicle also be seen as a vehicle categorised as "SG", based on it's specific technical features and special equipment for garbage disposal? The vehicle can be approved without exemptions set out in Annex XI, appendix 4.

QUESTION:

What procedure is correct if a manufacturer applies for a type-approval for a vehicle categorised as "SG"?

A	Category "SG" may be used for a vehicle although the technical features and special arrangements for its intended use doesn't mean that the exemptions in Annex XI, Appendix 4 must be used to grant a type-approval.
B	Category "SG" is only to be used for a vehicle which can't meet the requirements for type-approval without the exemptions in Annex XI, Appendix 4, based on its specific technical features and special arrangements for its intended use.

Type approving authority "e"	5
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Selection of solution		accepted	refused
	A	X	X
	B	X	X

TAAM Minutes:

Netherlands: would accept answer A

UK: regulation 73 about the side guards, there are exemptions where it is not possible to place side guards but that doesn't mean that this is a SPV

Austria: can this problem be discussed in the SPV group and send these 2 questions to the Commission

Chairman: Austria may send these 2 questions (5.7 and 5.8) to the Commission

5.9. Coupling & Trailer Approval (France)

Coupling & Trailer Approval

- Regulation number:
 - Directive 94/20/EC related to the mechanical coupling devices of motor vehicles and their trailers and their attachment to those vehicles
 - Framework Directive 2007/46/EC

Type approving authority « e » 2

- Issue

Question 1:

Would it be possible to grant an approval for a motor vehicle and a trailer so that the combination of them is not articulated ? (For example, let consider a N1 and an O2 -> see picture n°1)



Possibilities of solution

Comments

	A	Yes	
	B	No	Without articulation, this combination is similar to a N2 vehicle (N1 : 3.5t + O2 : 3t = 6.5 t) and this “vehicle” do not fulfil the requirements of N2 category (RUP, Braking, speed limiter ...) This case would be a competitive distortion in relation to “true” high duty vehicle.

Question 2:

Would it be possible to grant an approval for a motor vehicle with a coupling which is not a fifth wheel, immediately behind the cab ? (see picture n°2)



A	Yes	
B	No	

TAAM Minutes:

Combination of 2 vehicles (truck and trailer), can it be approved so that the combination is not articulated?

UK: question 1 and 2: NO, we don't agree. This doesn't look right, what kind of coupling is it, ... So many questions, so too difficult

Spain: agree with UK.

Austria: similar to the Bratislava question point 5.4. Also refers to point 5.10 of the UK

Luxembourg: no regulation says that it has to be articulated. The combination cannot be forbidden (talking about only the trailer)

Germany: supports point of view of the UK and Austria. For the vehicle is it definitely a no go. For the coupling, it's on the edge. There's no way it can be approved as a vehicle.

Belgium: the approval of the placing of the coupling is not possible

Netherlands: for the first question: approval possible for the combination, and for the truck itself, but not for the trailer as we see it in the picture on the left.

The second question:

Spain: you can approve the combination, but do you allow to add or remove an axle?

Germany: When you approve it as one vehicle with 3 axles, you may not divide it anymore. So if the customer divides it, the approval isn't allowed anymore.

UK: (Netherlands) opinion is interesting

Austria: SP vehicles in Austria have two approvals in this case. One with 2 axles and one with 3 axles

Netherlands: it's similar in the Netherlands as in Austria, so multiple approvals possible for a vehicle

Luxembourg: also the point of different driver license in both cases

Germany : approval as a trailer is not possible. On a national basis member state may grant approvals for this vehicles, but for Germany it is not possible.

Germany (): we have a problem with the forces on the coupling, they are not approved according to 94.20

Luxembourg: not agree with Germany

Conclusion: different opinions, not a consensus

5.10. ECE R55 Mechanical Couplings – Castor Trailers (UK)

UK1 QUESTION FOR TAAM Belgium – December 2012

ECE R55

Mechanical Couplings - Castor Trailers

LEGISLATION

Background

VCA has been approached by the manufacturer of an unconventional trailer (see below) this trailer has multiple fixing points to the towing vehicle and does not articulate as a conventional trailer would or have a single conventional mounting point. The wheels are of a castor type.





Question:

Because the trailer has multiple attachment points we would like to ask TAAM if it is possible to approve such a trailer? If so, how should the testing be done?

Option	Possible Solution	Comments
A	Yes it is possible	
B	No it is not possible	
C	Other	

TAAM Minutes:

Can this be approved as a trailer?

UK: this sticks out a long way, they don't think it can be approved

Germany: this has been already discussed in several groups. Why not ask the Commission to declare a new category of trailers to approve this kind of trailers. On national basis this should be possible.

He also asked it to mobile home constructors if they would allow to attach this trailer to their vehicles.

France: this question and the previous ones are similar. We need to have the same answer to all of these questions. If we accept it in one case, we should also accept it for the other questions.

Austria: at least one type approval exists already for this kind of vehicles and there are several vehicles already riding around in Austria (registered also)

Germany (): the trailer in the previous question we doubted because of the different loads on the towing vehicle. This could be a safety issue if you're putting heavy loads on this trailer.

Belgium: we give no approval for this kind of trailer

Chairman: we don't see why to give an approval for this kind of vehicle, but there has been already given an approval for this kind in Austria

Conclusion: Majority doesn't want to approve it

5.11. EC type-approval for mechanical coupling device exclusively designed to be installed on WVTA without towing mass capacity. How to proceed (registration, ...) when this coupling device is fitted to a vehicle? (Belgium)

Directive or Regulation number:

- 2007/46/EC
- 94/20/EC or ECE R55
- 2001/95/EC

Subject:

Installation of aftermarket equipment which causes maximum technical masses or dimensions to exceed.

Reference to Annex, etc in the Directive or Regulation:

- 2001/95/EC Art1. 2
- 2007/46/EC Art29
- 94/20/EC Annex VII

Background:

Vehicles without towing capacity are being equipped with mechanical coupling devices. The mechanical coupling device has an EC type approval. Its installation and operating instruction guide indicates that the coupling devices are manufactured for installation on one specific vehicle type. All variant versions of this vehicle type are without towing capacity.

Towing masses are mentioned in the installation guide that accompanies the towing device itself.

The vehicle manufacturer himself is not aware of these modifications. Therefore he could not advice nor make any provisions in order to extend influenced directives:

- masse and dimensions
- breaking
- steering
- emissions

Text:

Annex VII of 94/20/EC

REQUIREMENTS RELATING TO THE TYPE-APPROVAL OF THE VEHICLE TYPE WITH REGARD TO THE OPTIONAL ATTACHMENT OF MECHANICAL COUPLING DEVICES TO THIS VEHICLE.

1. GENERAL REQUIREMENTS

1.1. The vehicle manufacturer shall state which types and classes of coupling devices may be fitted to the vehicle type giving the values of D, V (1), S or U (if applicable) which are based on the construction of the vehicle type in combination with the type(s) of the coupling device(s) intended to be used. The characteristics D, V, S or U of the coupling devices approved in accordance with this Directive shall be equal or greater than the characteristics given for the combination concerned.

Article 29 of 2007/46/EC

1. If a Member State finds that new vehicles, systems, components or separate technical units, albeit in compliance with the applicable requirements or properly marked, present a serious risk to road safety, or seriously harm the environment or public health, that Member State may, for a maximum period of six months, refuse to register such vehicles or to permit the sale or entry into service in its territory of such vehicles, components or separate technical units.

In such cases, the Member State concerned shall immediately notify the manufacturer, the other Member States and the Commission accordingly, stating the reasons on which its decision is based and, in particular, whether it is the result of: — shortcomings in the relevant regulatory acts, or — incorrect application of the relevant requirements.

Question:

However the base EC type-approval of the vehicle was valid upon registration, its approval expires as soon the installation of aftermarket equipment leaves the vehicle out of the boundaries, set by the manufacturer. What actions should be taken?

Solutions:

A	Bring vehicle in its original state.
B	Start procedure according Art 29. - Prohibit service for these vehicles in the Member-State - Notify manufacturer, other Member States and Commission.
C	Leave vehicles with coupling device installed but keep towing capacity to zero.
D	Manage this issue on a national / individual approval level only

Decision:

<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A	x	
B	x	
C		x
D		x

Authority:

Type approval Authority e/E **6**

TAAM Minutes:

Germany (): they had a vehicle (Smart) on their market without towing capacity, but they gave it on national bases a towing capacity. They did testing to verify the safety of this coupling. Should be possible on national base.

Latvia: what with multistage?

Belgium: the vehicle manufacturer doesn't want that his vehicle has a towing capacity. What with responsibility

Germany: there were severe tests, but only on national base allowed. They saw it was a safe situation and in their case, Daimler didn't see a problem as long as they cannot be taken responsible in case of problems.

UK: it's up to each member state to allow or refuse it

Chairman: it's not clear if we can specify a clear answer

Netherlands: solution D

Main part of the participants choose option D

5.12. Regulation (EU) 582/2011, alternative use of OBD-System for EURO 6 LDV (Germany)

Issue:

Annex X of EU-Reg 582/2011 allows manufacturers to use an alternative OBD System which is based on those of Reg 692/2008 . The EURO 6 OBD-levels of LDV start with EURO 6- following 6-1 and 6-2. The HDV EURO VI levels are categorised VI-A, B, C. The transitional provisions are very similar but not congruent!

Which approach is the correct one if the regulation allows to use 'EURO 6'-OBD? The approach shall take into account the transitional provisions of the next OBD levels 6-1, 6-2 and / or align the implementing dates to those of EURO VI A, B, C!

Questions:

Is it possible or feasible to start with EURO 6- level using the alternative approval??

Prescription:

2.4. Alternative approval

2.4.1. If requested by the manufacturer, for vehicles of category M 1 , M 2 , N 1 and N 2 with a maximum permissible mass not exceeding 7,5 tonnes and M 3 Class I, Class II and Class A and Class B as defined in Annex I to Directive 2001/85/EC with a permissible mass not exceeding 7,5 tonnes, compliance with the requirements of Annex XI to Regulation (EC) No 692/2008 according to OBD standard Euro 6 as defined in Appendix 6 to Annex I to Regulation (EC) No 692/2008 shall be considered equivalent to the compliance with this Annex.

If such alternative approval is used, the information related to OBD systems in Sections 3.2.12.2.7.1 to 3.2.12.2.7.4 of Part 2 of Appendix 4 to Annex I is replaced by the information of Section 3.2.12.2.7 of Appendix 3 to Annex I to Regulation (EC) No 692/2008.

Selective application of the provisions of this Annex and of the provisions of Annex XVI to Regulation (EC) No 692/2008 shall not be permitted except to the extent explicitly set out in Section 2.4.1.

Annex: Timeline for OBD

Possibilities of solution

Comments

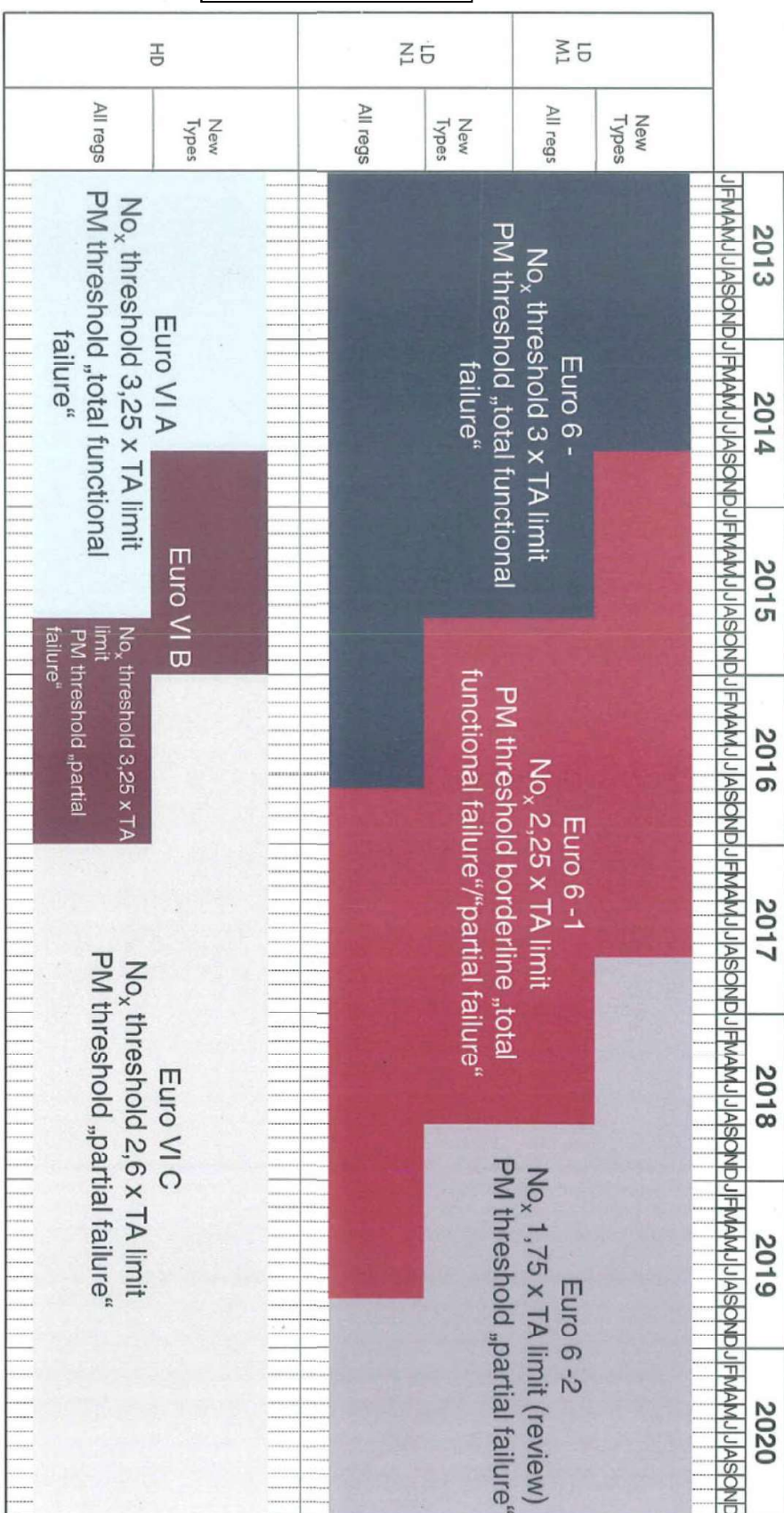
1	A	Manufacturer can start with the EURO 6-level which is comparable to the EURO VI A	At time of the Original 582/2011 the 6-1 level was not decided – so in the Reg. the reference was simply called EURO 6, which therefore can be interpreted as the first EURO 6 OBD level = EURO 6-. This seems to be logical comparing the transitional provisions of LDV and HDV legislation! (see annex)
	B	Manufacturer has to start with OBD level 6-1 because: Euro 6 means a <u>real</u> EURO 6, which then is the level 6-1!	

Type approving authority "e" 1

Selection of solution		accepted	refused
	A	X	
	B		X

TAAM Minutes:

Germany: the 2 legislative acts are not aligned.
Comparison between the 2 transitional positions (look at the scheme in the document). Certainly the transition of Euro 6- to Euro 6-1.
The legislation of the heavy duty and the light passenger cars ???
Time scale for passenger cars is different to that of heavy duty vehicles
UK and Belgium supports German proposal
Netherlands: follows Germany but not as strict
UK: in multistage vehicles that go from N1 to M1 (Minibusses), second stage vehicle should keep the time table of N1



5.13. Monitoring of DPF (A or B in the approval number) 595/2009/EC as amended by 64/2012/EC (Netherlands)

Directive or Regulation number:

595/2009/EC as amended by 64/2012/EC

Subject:

Monitoring of DPF (A or B in the approval number)

Reference to Annex, etc in the Directive or Regulation:

Annex I, Appendix 9 of the 582/2011

Annex X of the 582/2011

Text:

Appendix 9

EC Type-Approval Certification Numbering System

1. Section 3 of the EC type-approval number issued according to Articles 6(1), 8(1) and 10(1) shall be composed by the number of the implementing regulatory act or the latest amending regulatory act applicable to the EC type-approval. The number shall be followed by an alphabetical character reflecting the requirements of OBD and SCR systems in accordance with Table 1.

Table 1

Character	NO _x OTL ⁽¹⁾	PM OTL ⁽²⁾	Reagent quality and consumption	Implementation dates: new types	Implementation dates: all vehicles	Last date of registration
A	Row 'phase-in period' of Tables 1 and 2	Performance Monitoring ⁽³⁾	Phase in ⁽⁴⁾	31.12.2012	31.12.2013	1.9.2015
B	Row 'phase-in period' of Tables 1 and 2	Row 'phase-in period' of Table 1	Phase in ⁽⁴⁾	1.9.2014	1.9.2015	31.12.2016
C	Row 'general requirements' of Tables 1 and 2	Row 'general requirements' of Table 1	General ⁽⁵⁾	31.12.2015	31.12.2016	

Key:

⁽¹⁾ 'NO_x OTL' monitoring requirements as set out in Table 1 and 2 of Annex X.

⁽²⁾ 'PM OTL' monitoring requirements as set out in Table 1 of Annex X.

⁽³⁾ 'Performance monitoring' requirements as set out in point 2.3.3.3 of Annex X.

⁽⁴⁾ Reagent quality and consumption 'phase-in' requirements as set out in points 7.1.1.1 and 8.4.1.1 of Annex XIII.

⁽⁵⁾ Reagent quality and consumption 'general' requirements as set out in points 7.1.1 and 8.4.1 of Annex XIII.

According to this table you need for Row A for PM OTL performance monitoring and for Row B monitoring against the PM OTL limits

2.3.3. The monitoring requirements concerning particulate aftertreatment devices set out in Item 2(c) of Appendix 3 to Annex 9B to UN/ECE Regulation No 49 shall be understood and complemented as set out in points 2.3.3.1, 2.3.3.2 and 2.3.3.3.

2.3.3.1 The performance of the particulate aftertreatment device including the filtration and continuous regeneration processes shall be monitored against the OBD threshold limit specified in Table 1.

2.3.3.2. The periodic regeneration shall be monitored against the ability of the device to perform as designed (for example to perform regeneration within a manufacturer-specified time interval, to perform regeneration upon demand, etc.). This shall constitute one element of the component monitoring associated with the device.

2.3.3.3. Before the dates specified in Article 4(8) and in the case of a wall-flow diesel particulate filter (DPF), the manufacturer may choose to apply the performance monitoring requirements set out in Appendix 3 to this Annex instead of the requirements of Section 2.3.3.1, if he can demonstrate with technical documentation that in case of deterioration there is a positive correlation between the loss of filtration efficiency and the loss of pressure drop (delta pressure) across the DPF under the operating conditions of the engine specified in the test described in Appendix 3 to this Annex.

2.3.3.4. The Commission shall conduct a review of the monitoring requirements set out in point 2.3.3.1 by 31 December 2012. In case the technical non-feasibility of the respective requirements by the dates indicated in point 2.3.3.3 is demonstrated, the Commission shall make a proposal for amending these dates accordingly.

Question:

When you perform performance monitoring of the DPF and you can demonstrate that in case of deterioration there is a positive correlation between the loss of filtration efficiency and the loss of pressure drop across the DPF under the operation conditions of the engine specified in the test. Can this been considered that as OTL monitoring which means a letter B in the approval number?

Can you get only a letter B in the approval number when you monitor directly the PM emissions in the tailpipe with for instance a soot sensor?

Solutions:

A	Delta P monitoring without positive correlation gives an A in the approval number
B	Delta P monitoring with positive correlation gives an A in the approval number
C	Delta P monitoring with positive correlation gives an B in the approval number
D	Only PM OTL monitoring with an active sensor in the exhaust (soot sensor) gives an B in the approval number

Decision:

<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A	X	
B	X	
C		X
D	X	

Authority:

Type approval Authority e/E	4
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TAAM Minutes:

Netherlands: what's the opinion of the other member states, do we need a monitoring system in the exhaust pipe?

UK: we're not for A, but B and D can we agree

Germany: B is acceptable, answer C could be a the solution but it is not totally clear. So they want to investigate this further

Netherlands: it has been investigated by a group of experts, but they wanted to ask the opinion of the TAAM members (TÜV Nord as experts in it proposed B)

France: no special device needed, a correlation is also accepted

Chairman: conclusion: A is not accepted, the rest could be accepted

5.14. Use of ECO tyre pressure (Netherlands)

Directive or Regulation number:

Regulation (EU) 661/2009

ECE Regulation 64.02

Subject:

Use of ECO tyre pressure

Reference to Annex, etc in the Directive or Regulation:

Article 9 of the mentioned Regulation(s) (EU)

Paragraph 5.3 and Annex 5 of ECE Regulation 64.02.

Text:

Section 2 of Article 9 states:

2. Vehicles of category M1 shall be equipped with an accurate tyre pressure monitoring system capable of giving, when necessary, an in-car warning to the driver when a loss of pressure occurs in any tyre, in the interests of optimum fuel consumption and road safety

ECE R64.02 – Definitions:

- 2.16. *"Recommended cold inflation pressure (P_{rec})" means the pressure recommended for each tyre position by the vehicle manufacturer, for the intended service conditions (e.g. speed and load) of the given vehicle, as defined on the vehicle placard and/or the vehicle owner's manual*

Annex 5 section 1.4 and 2.1:

- 1.4.1. *Test weight.*

*The vehicle may be tested at any condition of load, the distribution of the mass among the axles being that stated by the vehicle manufacturer without exceeding any of the maximum permissible mass for each axle. **However, in the case where there is no possibility to set or reset the system, the vehicle shall be unladen.***

- 2.1 *...Inflate the vehicle's tyres to the vehicle manufacturer's recommended cold inflation pressure (P_{rec}), in accordance with the vehicle manufacturer's recommendation for the speed and load conditions, and tyre positions...*

Question:

In case the manufacturer declares 2 cold inflation pressures for normal use (vehicle condition unladen), e.g. “comfort pressure” and “ECO pressure”, which pressure has to be regarded P_{rec} for a TPMS with no possibility to set or reset the system ?

Solutions:

A	“comfort pressure”
B	“ECO pressure”
C	Both pressures have to be considered and must meet the requirements

Decision:

<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A	X	
B	X	
C		X
D	X	

TAAM Minutes:

Netherlands: Solution B

France is in favor of solution C

Belgium is in favor of solution A

Germany(): the explanation of the Netherlands is good and clear, but

Germany: C would be the best proposal, but B would also be possible

UK: B would be the best, but could also live with C

Belgium: we think this is a safety issue, and that’s why they chose for option A

Austria: the concern of CO2 emission, the solution should be B

Germany (): the manufacturer can choose which one to monitor. It is for both good, safety and comfort. So B or C

Belgium: B or C is OK

5.15. Deviation from NEDC shift points in favour of “start/stop” systems during idling (Netherlands)

Directive or Regulation number:

- Regulation (EU) 715/2007 and 692/2008 as amended by 459/2012
- ECE Regulation 83.06

Subject:

Deviation from NEDC shift points in favour of “start/stop” systems during idling.

Reference to Annex, etc in the Directive or Regulation:

- Section 6 of Annex 4a of ECE Regulation 83.06 and table 2 of this Annex.

Text:

“PM” means “gearbox in neutral, clutch engaged”

“K1” means “first gear engaged, clutch disengaged”

Question:

In the first stage of the Extra-urban cycle, a period of 20s is defined with the vehicle idling with the gear engaged and clutch disengaged before the first acceleration starts. Would you allow to reduce this idling time to e.g. 5s to allow optimum benefit of start stop systems ? In other words: split the K1 time of 20s in 15s PM and 5s K1.

Solutions:

1	No, the Type 1 test drive cycle is clearly specified and must be followed literally
2	Yes, we do allow to deviate from the prescribed shift points during idling time to allow for optimum use of the start/stop system during the Extra-urban drive cycle.

Decision:

<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
1	X	
2		X

Authority:

Type approval Authority e/E **4**

Remarks:

During the TAAM in Riga in 2011 it was discussed whether it would be allowed to deviate from the prescribed shift points during the 5s idling period in the urban cycle (agenda item 5.15). In the end, it was concluded that no deviation from the prescribed shift points should be allowed. Several delegates were initially willing to accept deviation from the prescribed shift points.

This question is raised because it was not discussed at that time whether deviation during the Extra-urban cycle would be allowed, during the first 20s idling period.

So far, RDW has followed the drive cycle exactly the way it is described. We believe deviation from the prescribed drive cycle is not possible within the current legislation, although we do not oppose the idea itself to benefit "start/stop" systems. It is important though that everyone is following the same approach such that no manufacturer has a benefit over the other. If consensus is reached that deviation should be allowed (solution 2), we believe this is only possible after the legislation is amended accordingly.

TAAM Minutes:

Netherlands: can we split the K1 time of 20s in to 15s PM and 5s K1? They don't want it to split, not clear what to do

Germany : what would be the approach of the Commission? Not quite clear what they should do, same opinion as the Netherlands

Austria: working groups in Geneva, they should decide

UK: follow meaning Austria, the text is clear and follow this

Solution 1 is chosen

5.16. IUPR monitors to be declared by vehicle manufacturer (Netherlands)

Directive or Regulation number:

- Regulation (EU) 715/2007 and 692/2008 as amended by 566/2011
- ECE Regulation 83.06

Subject:

IUPR monitors to be declared by vehicle manufacturer

Reference to Annex, etc in the Directive or Regulation:

- Annex XI of the mentioned Regulation(s) (EU)
- Annex 11 of ECE Regulation 83.06.

Text:

Section 3.2.1. of Annex XI (similar to Section 7.2.1. of Annex 11 to ECE R83.06)

*The numerator of a specific monitor is a counter measuring the number of times a vehicle has been operated such that all monitoring conditions necessary for the specific monitor to detect a malfunction **in order to warn the driver**, as they have been implemented by the manufacturer, have been encountered*

Section 3.6.1. of Annex XI (similar to Section 7.6.1. of Annex 11 to ECE R83.06) states:

The OBD system shall report in accordance with the ISO 15031-5 specifications the ignition cycle counter and general denominator as well as separate numerators and denominators for the following monitors, if their presence on the vehicle is required by this Annex:

- Catalysts (each bank to be reported separately)
- Oxygen/exhaust gas sensors, including secondary oxygen sensors (each sensor to be reported separately)
- Evaporative system
- EGR system
- VVT system
- Secondary air system
- Particulate filter
- NOx after treatment system (e.g. NOx adsorber, NOx reagent/catalyst system)
- Boost pressure control system

Question:

Which monitors must be considered as a minimum with regard to IUPR ?

It seems that there are different opinions among Type Approval Authorities and Technical Services about how to interpret the legislation on this point and therefore manufacturers and Type Approval Authorities are not sure what needs to be provided as a minimum.

Solutions:

A	all monitors of emission related systems that could generate a P0XX code
B	all monitors of emission related systems that could activate the MIL, regardless if the EOBD threshold limits are exceeded (e.g. misfiring)
C	all monitors related to the systems mentioned under section 3.6.1./7.6.1. that could activate the MIL, regardless if the EOBD threshold limits are exceeded.
D	all monitors of emission related systems where in case of a failure, the EOBD threshold limits are exceeded
E	all monitors related to the systems mentioned under section 3.6.1./7.6.1. where in case of a failure, the EOBD threshold limits are exceeded

Decision:		
<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A		X
B		X
C	X	
D		X
E		X

Authority:	
Type approval Authority e/E	4

Remarks:
The sentence: "if their presence on the vehicle is required by this Annex" refers to Annex 11 of ECE R83.06. In our opinion it does not state that a system, if it is monitored by the EOBD system but would not result in exceeding the EOBD threshold limits, need not be part of IUPR requirements.

TAAM Minutes:

Netherlands: which monitors must be considered?

France, Germany: solution C (support Dutch proposal)

Conclusion: C

5.17. Rounding of Pn on Type Approval Certificate (Netherlands)

Directive or Regulation number:
<ul style="list-style-type: none"> - Regulation (EU) 715/2007 and 692/2008 as amended by 459/2012 - ECE Regulation 83.06
Subject:
Rounding of Pn on Type Approval Certificate
Reference to Annex, etc in the Directive or Regulation:
<ul style="list-style-type: none"> - Section 2.1 of Appendix 4 to Annex I of the Regulation(s) (EU) - Section 2.1 of Annex 2 of ECE Regulation 83.06
Text:
According to footnote "vi" accompanying the tables in above mentioned sections, the final mean value calculated with Ki and DF (M.Ki.DF) should be rounded to one decimal place more than the limit value.
Question:
<p>The limit for Pn is set at 6.0×10^{11} [# / km] (Euro 5/Euro 6)*</p> <p>The test results are often given in a value other than 10^{11} for example: 3.82×10^9 [# / km]. This is also what has been stated in the Type Approval Certificate by several Type Approval Authorities (incl. RDW) so far.</p> <p>Actually we think that the correct way would be to state 0.04×10^{11} [# / km] on the Type Approval Certificate in this case. This also means that if the result had been for example: 3.82×10^8 [# / km], the Type Approval Certificate would state 0.00×10^{11} [# / km].</p> <p>Would you agree to state the Pn in [#10¹¹/km] and mention only the value as indicated in the example below ?</p>

Type 1 result	Test	CO (mg/km)	THC (mg/km)	NMHC (mg/km)	NO _x (mg/km)	THC + NO _x (mg/km)	Particu- lates (mg/km)	Particu- lates (#10 ¹¹ /km)
Measured ^{(i) (iv)}	1							
	2							
	3							
Measured mean value (M) ^{(i) (iv)}								
Ki ^{(i) (v)}						(ii)		
Mean value calculated with Ki (M.Ki) ^(iv)						(iii)		
DF ^{(i) (v)}								
Final mean value calculated with Ki and DF (M.Ki.DF) ^(vi)								0.04
Limit value								6.0

⁽ⁱ⁾ Where applicable.

⁽ⁱⁱ⁾ Not applicable.

⁽ⁱⁱⁱ⁾ Mean value calculated by adding mean values (M.Ki.) calculated for THC and NO_x.

^(iv) Round to 2 decimal places.

^(v) Round to 4 decimal places.

^(vi) Round to 1 decimal place more than limit value.

* see remarks

Solutions:

1	No, we would like to round the result to whole numbers incl. 2 decimal places; if the result were 3.82×10^9 [# / km], that is what we will state on the Type Approval Certificate
2	Yes, we agree that the best approach is to state the result in [#10 ¹¹ /km] in the header and state only the value 0.04 in the cell in such case

Decision:

<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
1		X
2	X	

Authority:

Type approval Authority e/E **4**

Remarks:

The same approach should be followed in the Annex VIII and Annex IX to 2007/46/EC. If consensus can be reached it will make life easier for Type Approval Authorities to fill their national database with test results in a consistent format, thus preventing errors.

If the limit value of 6.0×10^{12} is used for positive ignition engines with direct injection for the transitional period if applicable as indicated in Regulation (EU) 459/2012, the same logic can be applied for the limit value. This limit value shall be changed to **60** which is than 60×10^{11} . Because the header will not change.

TAAM Minutes:

Netherlands: How to write the results?

Austria: the field for the exponent is still needed and both have to be filled in

Germany (): not a strong meaning what the best result is. We cannot accept how it is done in the Dutch example

Conclusion: solution 1

5.18. MAC Directive 2006/40/EC New Information after Real-Life tests by a manufacturer (Germany)

Info:

The KBA would like to inform about a recall campaign in Germany.

A German car manufacturer made just recently a so called Real-Life test with some of his vehicles to provide additional ... of the safety of that vehicles accompanying ISO 13043 FMEA analysis.

During this tests the vehicle was conditioned in a way of normal usage. The car was driven with a speed of up to motorway limits on a track to provide higher exhaust temperature. After parking the car a light-crash and refrigerant leakage was simulated by opening the bonnet for a few cm and open a valve which releases the refrigerant under normal pressure conditions.

The refrigerant caught fire and was in the test distinguished by an switchable fire-distinguisher.

The KBA classified the vehicle type as being a severe risk for traffic safety.

The vehicle manufacturer announced, that this incident will be transferable to other types and not only happen to this vehicle type only! This might also be the case for other vehicle manufacturers.

The KBA would like to inform and if possible to get the view of other TAA.

TAAM Minutes:

Germany (): one of their manufacturers found out that this new refrigerant gives risk to fire. Had also contact with the Commission to find a solution. Now asks the TAA group for their opinion.

Belgium: how did the old refrigerant react in the same test?

Germany (): the old refrigerant didn't set fire. You can see that the fire start with the refrigerant (new). The new is flammable, the old not.

Germany (): the new refrigerant is more flammable on an earlier point. They need some time to make tests

Luxembourg: there manufacturer asked them what will happen after the first of January. They don't support to make extensions on old vehicle types

Netherland: got also questions of their manufacturers, they see no reason to delay the timing, for the moratorium

Germany: there is a leakage, they need three to six months to come to a conclusion, because other manufacturers are testing this problem

UK: the Commission is quiet angry about this way of evolving . They don't want any delay. In the UK, they want that their manufacturers use the new refrigerant starting from the first of January

Germany: for now this should be decided on a national base. Monitoring phase needed in Europe

UK:

Netherlands: you don't really know which vehicle is really equipped with the new refrigerant. Can be decided on national base. What about the registration

Germany (): why should you not allow the registration of the vehicles if they don't have the new refrigerant inside

Germany: the Commission never said it was a moratorium

Chairman: asks to give feedback to the KBA during the pause.

5.19. 2007/46 – Article 3 (UK)

LEGISLATION

Article 3 – Definitions 'EC type-approval certificate' means the certificate set out in Annex VI or in the corresponding annex to a separate directive or regulation, the communication form set out in the relevant Annex to one of the UNECE Regulations listed in Part I or Part II of Annex IV to this Directive, being deemed to be equivalent thereto;

Background

Several regulations now have additional suffix letters or numbers added to the approval number in order to identify a specific approval level or the inclusion of additional requirements, for example Regulation 64 states the following:

4.4. There shall be affixed, conspicuously and in a readily accessible place specified on the approval form, to every vehicle conforming to a vehicle type approved under this Regulation an international approval mark consisting of:

4.4.1. A circle surrounding the letter "E" followed by the distinguishing number of the country which granted approval ;

4.4.2. The number of this Regulation, followed by:

4.4.2.1. The letter "R" in the case of vehicles approved in accordance with paragraph 4.1.1. only;

4.4.2.2. The letter "P" in the case of vehicles approved in accordance with paragraph 4.1.2. only;

4.4.2.3. The letters "RP" in the case of vehicles approved in accordance with both paragraphs 4.1.1. and 4.1.2.;

4.4.3. A dash and the approval number to the right of the markings prescribed in paragraphs 4.4.1. and 4.4.2.

Therefore for a vehicle that complies with the requirements of 4.4.2.3 of the regulation will carry the approval number E11 64RP-021234. However it is not clear if this number should appear on the certificate including the additional suffixes

Question: Should the approval certificate contain all or any additional letters/numbers?

Option	Possible Solution	Comments
A	No. The approval number on the certificate should only contain the approval authority identification (E11) the regulation number (64R 02) and the individual approval number (1234)	
B	Yes. The approval number on the certificate should contain all the identification requirements above and any additional suffixes	
C	Other	

TAAM Minutes:

UK: approval marks on components, maybe we should postpone it to Geneva

Are approval number and marking the same?

Germany : answer B

UK: the approval numbers and marks should match

Austria: answer B, but it make no sense if not all the member states follow this

Netherlands: approval number is only the sequence number, but in practice they add the entire number. There's need for an harmonized system

Belgium: supports B, we apply this rules already for many years

Chairman: answer B, and ask Geneva to clarify this topic

Netherlands is already busy preparing a document for Geneva

5.20. EC Regulation 715/2007 and 692/200 as amended by EU Regulation 630/2012 (UK)

EC Regulation 715/2007 and 692/200 as amended by EU Regulation 630/2012: Emissions from light passenger and commercial vehicles (Euro 5 and Euro 6) and on access to repair and maintenance information

LEGISLATION

Annex XVI – requirements for vehicles that use a reagent for the exhaust after treatment system

BACKGROUND

Annex XVI of the above mentioned legislation includes requirements for operation of the driver inducement systems if the reagent tank is allowed to become empty, or the reagent dosing system is not operational.

There are four inducement options available to the manufacturer, described in paragraph 8.3 of Annex XVI. The 'no engine restart after countdown' approach (8.3.1) includes a gradual introduction before the full inducement system is activated and engine starts are prevented.

"8.3.1. A 'no engine restart after countdown' approach allows a countdown of restarts or distance remaining once the inducement system activates. Engine starts initiated by the vehicle control system, such as start-stop systems, are not included in this countdown. Engine restarts shall be prevented immediately after the reagent tank becomes empty or a

distance equivalent to a complete tank of fuel has been exceeded since the activation of the inducement system, whichever occurs earlier.”

Paragraph 8.4 of Annex XVI specifies the following:

“8.4. Once the inducement system has fully activated and disabled the vehicle, the inducement system shall only be deactivated if the quantity of reagent added to the vehicle is equivalent to 2 400 km average driving range, or the failures specified in sections 4, 5, or 6 have been rectified. After a repair has been carried out to correct a fault where the OBD system has been triggered under point 7.2, the inducement system may be reinitialised via the OBD serial port (e.g. by a generic scan tool) to enable the vehicle to be restarted for self-diagnosis purposes. The vehicle shall operate for a maximum of 50 km to enable the success of the repair to be validated. The inducement system shall be fully reactivated if the fault persists after this validation.”

QUESTION

The final sentence of paragraph 8.4 specifies that the inducement system is “fully reactivated” if the fault still persists after the validation period.

In the case of the ‘no engine restart after countdown’ approach, does “fully reactivated” mean that the countdown starts again from the beginning, or does “fully reactivated” mean that engine restarts are immediately prevented?

Possibilities of solution

Option	Possible Solution	Comments
A	“Fully reactivated” means the countdown starts from the beginning	
B	“Fully reactivated” means that engine starts are immediately prevented	

TAAM Minutes:

**France is in favor of option B
Netherlands, Belgium , Germany also B
Conclusion: B**

5.21. Are ranges allowed on COC masses and dimensions data for extendible and modular trailers? (Belgium)

Directive or Regulation number:
- 2007/46/EC - ECE R54
Subject:
Dimensions and masses on COC for extendible trailers for exceptional load transport trailers O4.

Reference to Annex, etc in the Directive or Regulation:
- 2007/46/EC Annex II Part A 5.10 - 2007/46/EC Annex IX 0.

Background:
<p>As mentioned into the Directive 2007/46/EC, it's not permitted to mention any range of values in the various entries of the CoC.</p> <p>A lot of vehicles concerned by the definition of exceptional load transport are extendible therefore concerned by at least a range regarding the length, wheelbase and width in some cases.</p> <p>Moreover in some cases and with speed restrictions (see UNECE 54), the maximum permissible load per tyre may vary. This will lead to variations of the maximum permissible axle load and the technically permissible maximum laden mass of the vehicle.</p>

Text:
<p><u>2007/46/CE</u></p> <p><u>ANNEX II</u> PART A Criteria for vehicle categorization 5. Special purpose vehicles</p> <p>5.10. Exceptional load transport trailer SK a vehicle of category O 4 intended for the transport of indivisible loads that is subject to speed and traffic restrictions because of its dimensions. Under this term are also included hydraulic modular trailers irrespective of the number of modules</p> <p><u>ANNEX IX</u> EC CERTIFICATE OF CONFORMITY</p> <p>0. OBJECTIVES The certificate of conformity is a statement delivered by the vehicle manufacturer to the buyer in order to assure him that the vehicle he has acquired complies with the legislation in force in the European Union at the time it was produced.</p> <p>The certificate of conformity also serves the purpose to enable the competent authorities of the Member States to register vehicles without having to require the applicant to supply additional technical documentation.</p> <p>For these purposes, the certificate of conformity has to include:</p> <ul style="list-style-type: none">(a) the Vehicle Identification Number;(b) the exact technical characteristics of the vehicle (i.e. it is not permitted to mention any range of value in the various entries).

Question:**How to handle the length range and technical maximum permissible masses?****Solutions:**

A	Variations in vehicle length should be mentioned as a remark on the COC.
B	Mass increments based on speed related increments in tyre load capacity ECE R54 are subject to specific national regulations for each Member State individually. A specific national annex regarding masses may be included in the information document. These values may be mentioned as a remark on the COC.
C	Manage the issue on a national / individual approval level only.

Decision:

<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A		
B		
C		

Authority:Type approval Authority e/E **6****TAAM Minutes:****Belgium: it is not permitted to mention a range of values for extendible trailers****Austria: solution A including additional information concerning load capacities****Minimum length on the CoC and all the other lengths in the remarks****UK: support solution C****Germany: solution A and B, minimum length in the template and all the other in remarks****Ireland: Solution A****Belgium: Do we also have something in the information document. We need something over here to know for example if the speed increases****UK****Conclusion: first question: remarks in the field 52 on the CoC with the minimum length. The lengths on the CoC-remarks. Second question: no one is against, special masses in the remarks**

5.22. TAA Meeting on Conformity of Production procedures (Finland)

COUNTRY: Finland

QUESTION NR.: 2

SUBJECT: TAA Meeting on Conformity of Production procedures

REFERENCES (DIRECTIVE/ANNEX/ETC):

Framework Directive 2007/46/EC

QUESTION/PROBLEM/CONCERN:

Directive 2007/46/EC among other responsibilities mandates in Article 5 the manufacturer to ensure conformity of production. In Article 12, the Member State granting the approval is required to verify the presence of adequate conformity of production measures established by the manufacturer and, to do this by means limited to the procedures set out in Annex X of the Framework Directive and in those regulatory acts that contain specific requirements. Furthermore, when requested by the approval authority of the Member State granting the approval the actual initial assessment and/or verification of product conformity arrangements may also be carried out by the approval authority of another Member State or the appointed body designated for this purpose by the approval authority. The procedures and practices chosen by different Member States may vary from one another, and as the increasing number of Member States also produces increasing number of bodies practicing conformity of production measures under the Framework directive.

Finland would like to raise a question whether other delegates of the TAAM have interest in having a meeting around topics related to conformity of production measures? Learning, sharing and benchmarking amongst the approval authorities could be useful. One issue could be discussing the influence of the new regulations on L- and T- categories in the context of conformity of production measures.

Realizing that, this is a little off-topic on the agenda of the TAAM and the experts on CoP would in many cases be other than those attending the TAAM, Finland would like to express a will to host such a meeting if considered desirable by other delegates of the TAAM.

TAAM Minutes:

Is there interest to have a meeting concerning the COP. They want to host this meeting.

UK: COP is very important, they want to participate to this meeting

Belgium, Netherlands, Germany, Spain, Estonia, Austria also wants to participate

Chairman congratulates Finland for this idea

Somewhere in the beginning of 2013

5.23. Repair-and-Maintenance-Information, RMI-subgroup (Germany)

Info:

As already announced in the first 2012 TAAM in Bratislava, the KBA would like to share experiences to the application of the provisions of RMI with other TAA.

Therefore we would like to prepare a meeting as a TAAM-subgroup which may be situated in parallel to the GSR-SG.

TAAM Minutes:

Discussed in previous item

5.24. 2007/46 – Annex 1 (UK)

LEGISLATION

Annex 1 - 2.6 Mass in running order; Mass of the vehicle with bodywork and, in the case of a towing vehicle of category other than M₁, with coupling device, if fitted by the manufacturer, in running order, or mass of the chassis or chassis with cab, without bodywork and/or coupling device if the manufacturer does not fit the bodywork and/or coupling device (including liquids, tools, spare wheel, if fitted, and driver and, for buses and coaches, a crew member if there is a crew seat in the vehicle) (h) (maximum and minimum for each variant): . . .

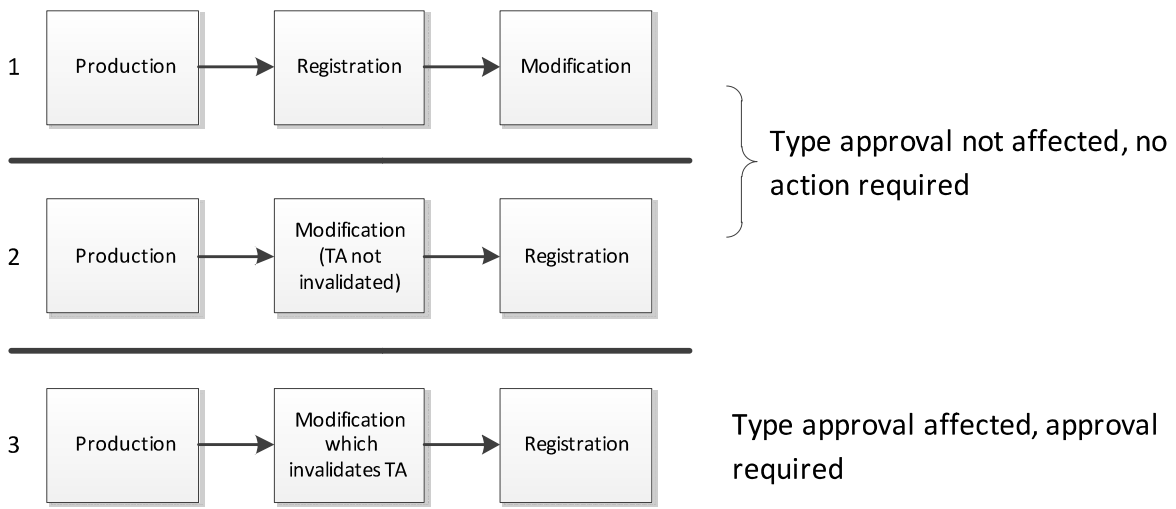
Background

VCA would like the opinion of the TAAM on how to define the racking that is fitted to some vans (see examples below).





If the racking is considered as part of the type approval system there are three possibilities for dealing with this situation



One of the main reasons for invalidating the type approval will be the potential increase in mass in running order which exceeds the permitted tolerance. The correct mass in running order should be stated at item 13 of the CoC.

If the racking is considered as part of the vehicle payload then this does not affect the type approval and no further action is required

Question:

Should the racking be classed as part of the mass in running order or should the racking be classed as payload?

Option	Possible Solution	Comments
A	The racking should be part of the mass in running order	
B	The racking should be considered part of the payload	
C	Other	

TAAM Minutes:

UK: payload or not

Austria: only if the owner wants to have the highest mass in running order on his registration, they 'll do this. Other wise use of the original CoC

What about the definitions in the new regulation of masses and dimensions

Spain: part of the mass in running order, solution B

Belgium: payload

Ireland,Germany: payload

Latvia: part of the mass in running order so it has become a part of the vehicle, permanently installed

Chair: solution B

5.25. Technically permissible maximum laden mass (Sweden)

SUBJECT: Technically permissible maximum laden mass (TPMLM)

DIRECTIVE: 2007/46/EC

RELEVANT SECTION:

Annex II: Part B (old and new)

Concern:

Multiple TPMLM for one version of O₁ and O₂ vehicles.

Annex II (old):

B. Definition of vehicle type

4. For the purpose of categories O₁, O₂, O₃ and O₄:

'Version' of a variant means vehicles, which consist of a combination of items shown in the information package.

5. For all categories:

Full identification of the vehicle just from the designations of type, variant and version must be consistent with a single accurate definition of all the technical characteristics required for the vehicle to be put into service.

Annex II (New):

Part B Criteria for vehicle types, variants and versions

5. Categories O₁ and O₂

5.3. Version 5.3.1. A 'version' within a variant shall group the vehicles which have all the following features in common:

(a) the technically permissible maximum laden mass;

(b) the concept of the suspension (air, steel or rubber suspension, torsion bar or other);

(c) the concept of the drawbar (triangle, tube or other).

QUESTIONS:

1. Can there be more than one TPMLM for one version of a vehicle in categories O₁ and O₂ based on the definitions above?

2. The CoC should have the TPMLM given under item 16, so there can only be one value for one version. (the procedure with intended registration/in service TPMLM under item 17 is not applicable for categories O₁ and O₂ according to Annex IX.)

Type approving authority "e"	5
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Selection of solution		accepted	refused
	1		X
	2	X	

TAAM Minutes:

Sweden: Question 1 and 2, what is the opinion of the other member states

Sweden: Only one technically permissible laden mass possible

Austria: multiple registration masses, it's a question of driver's license. They have two entries, TPLM and registration mass

Chair: only one TPLM is needed for approval

Germany (): technical permissible mass can be higher than the registration mass. They follow the suggestion of Sweden.

Spain: follows the meaning of Austria, the trailer can only have one TPLM, but allow different registration mass

CONCLUSION: Only one TPLM in one version is allowed

5.26. Multistage EC type-approval after 29 Oct 2012 on base WVTA not amended by 678/2011/EC. Meet regulation 678/2011/EC of not? (Belgium)

Reference to Annex, etc in the Directive or Regulation:

2007/46/EC

Background:

The possibility exists to have a multi-stage EC type-approval, in which the first stage is approved in accordance with framework directive 2007/46/EC not amended by regulation 678/2011/EC and the second and following stages are issued after 29 October 2012 and therefore approved in accordance with the framework AND amended by regulation 678/2011/EC.

Since regulation 678/2011/EC re-defines type, variant and version there may be a hard to resolve incompatibility between the vehicle matrix and key from the different stages.

Question:

May regulation 678/2011/EC be ignored after 29 October 2012 for multistage type-approvals when the previous type-approval is not amended by 678/2011/EC?

Solutions:

A	Yes, the multistage type-approval must at least comply with the amendment of the previous stage.
B	No, the multistage type-approval must comply with the actual amendment. This can imply a full revision of the base approval and its consecutive stages.
C	Manage the issue on a national / individual approval level only.

Decision:

<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A	x	
B		x
C		

Authority:

Type approval Authority e/E **6**

TAAM Minutes:

France supports A

Germany () finds this an important question for all kind of approvals, supports A

Germany (): is a second stage really a new type? Yes, but the principles follows the old rules

Spain: in favor of solution B

UK: solution A

Conclusion: majority is A. We should have more clear rules. Also te be discussed more in the MSWG.

By the next TAAM Belgium will clarify this case

5.27. Worst-case description in test reports (Germany)

Issue:

Directive 2007/46/EC annex V appendix 3 number 5 states that the test report shall include a reference stating how the worst-case selection has been made by the manufacturer, if applicable.

In the past, there were issues of obviously wrong worst-case selection. The requirement concerning a clear analysis (and in result clear description) of possible combinations of most unfavourable features would avoid submission of unacceptable test reports. If it is not possible or not practicable to test the one combination of most unfavourable features, a detailed description would help to evaluate if the selection (the test report) is acceptable. Germany would like to avoid different interpretation of the corresponding clause in 2007/46/EC and thus in possible disadvantages for approval authorities requiring a detailed description.

Questions:

Which level of detail describing the worst case selection is required in test reports?

Prescription

Directive 2007/46/EC

Possibilities of solution

Comments

	1.1. The selection is to be described in detail.	Easy to evaluate each case by the approval authority. Maximum workload for the technical service.
B	Reference to internal documented procedures of the technical service describing the selection is acceptable. Deviations must be described in detail. Example: Worst-case selection in accordance with procedure A-123. For the given type, it is impossible to take ... Hence the combination of ... is seen as worst case.	The general approach (internal procedures) will be evaluated within the designation process (incl. surveillance). All required information for approval granting is available. Optimal workload for the technical service.
C	A statement that the worst case was tested is sufficient (no detailed description). The technical service has documented procedures describing the selection. Deviations are documented only internally by the technical service.	The general approach (internal procedures) and documentation of deviations will be evaluated within the designation process (incl. surveillance). Small sample sizes in designation. Required information for approval granting is available only on request. Minimal workload for the technical service.

Type approving authority "e"	1
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Selection of solution		accepted	refused
	A		x
	B	x	
	C		x

TAAM Minutes:

Germany in favor of solution B, what are the opinions of the other member state UK, Belgium supports B

Netherlands: solution B is acceptable, but if you want to know the details, it has to be specified by the member state

Conclusion: B

LEGISLATION

Annex III 3.5 states the following.

From the relevant dates set out in Article 10(4) and 10(5) of Regulation (EC) No 715/2007, paragraph 4.1.2. of Appendix 3 to Annex 4 shall be understood as follows:

Tyres

The choice of tyres shall be based on the rolling resistance. The tyres with the highest rolling resistance shall be chosen, measured according to ISO 28580.

If there are more than three tyre rolling resistances, the tyre with the second highest rolling resistance shall be chosen.

The rolling resistance characteristics of the tyres fitted to production vehicles shall reflect those of the tyres used for type-approval

Background

Some countries require all the tyre and wheel combination to be listed in the approval, therefore if all combinations are listed in the emissions documentation then they should all be considered for type approval purposes, however winter tyres are generally option tyres and are not fitted in production

Question:

If a manufacturer wants to declare 2 normal tyres + 3 winter tyres would TAAM members expect the manufacturer to conduct coast downs and emissions test on the winter tyre which would generally have the worst rolling resistance or would they except that winter tyres are not normally production tyres?

Option	Possible Solution	Comments
A	All options should be considered including winter tyres and the worst case tyre selected in accordance with the tyre selection requirements of section 3.5	
B	Only tyres fitted on production vehicles should be considered, if winter tyres are not fitted to production vehicles they should not be considered.	

TAAM Minutes:

Which tyres have to be declared. UK says A. For the emission it is better to use the winter tyres, because of the worst case

Germany: solution B, not keeping the winter tyres in

Chairman asks the UK delegate to reformulate this question, no opinion

5.29. N3 vehicle as lorry BA AND tractor BC. How should its COC be composed? (Belgium)

Background:

- Lorry: a vehicle which is designed and constructed exclusively or principally for conveying goods (bodywork type BA).
- Tractor unit for semi-trailer: a towing vehicle which is designed and constructed exclusively or principally to tow semi-trailers (bodywork type BC).

The requirements do not match for both bodywork types BA & BC for following regulatory acts:

- 70/221/EEC Rear under run protection, Annex II, 5.5
- 71/3220/EEC Breaking
- 89/297/EEC Lateral protection, Annexe I, 1.1
- 94/20/EC Mechanical couplings

Question:

- 1. What should be the primary bodywork type?**
- 2. On what level should the bodywork type selection be managed?**

1. Solutions:

A	BA Lorry.
B	BC Tractor of semi-Trailer
C	The manufacturer may chose between BA and BC.

2. Solutions:

A	The issue is managed on national/individual approval level only
B	Manage on EC type approval level and indicate the double vehicle status as remark on its COC.
C	Both A & B solutions are possible.

Decision 1:

<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A		
B		
C		

Decision 2:

<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A		
B		
C		

Authority:

Type approval Authority e/E	6
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TAAM Minutes:

**C for question 1 and B for question 2
Germany: on EC level they see a problem, different rules for the different types**

5.30. Directive 76/114/EEC and Regulation 19/2011 (Lithuania)

Issue

Directive 76/114/EEC and Regulation No. 19/2011 prescribes requirements for statutory plates.

Legislation:

Question:



Is the statutory plate for two axles trailer fulfilled correctly?

	Possibilities of solution	Comments
A	No	
B	Yes	
C	Other	

Type approving authority "e" 36

Selection of solution		accepted	refused
	A	X	
	B		X
	C		

TAAM Minutes:

Lithuania: is this statutory plate correct? There is only one axle mentioned on the plate, but there are 2 axles on the trailer

Belgium: there is no type approval number + there should be the maximum mass on each axle

Lithuania: it concerns an individual national approval

Netherlands: the two axles can be seen as one and only one value is needed

France: the mass for each axle has to be mentioned

Austria: Regulation 19/2011. This looks like an old trailer, and in that time two axles nearby could be seen as one. Today it's not possible anymore, so for new types 2 axles.

6. Other

6.1. Presentation by representatives of Japan

- Presentation of MILT (Ministry of Land, Infrastructure, Transport and Tourism) by Mr. T Matsuo
- Presentation of NTSEL (National Traffic Safety and Environment Laboratory) by Mr. A. Sato

6.2. Presentation by Germany (6/12/2012) Concerning a special lamp – direction indicator which runs from left to right

Netherlands: did GRE approved this lamp?

Germany: yes, GRE would change the legislation, make a proposal

Luxembourg: This lamp would not be possible according R48, because it doesn't fulfil the requirements

Netherlands: confirms this, they have it difficult to believe that this can be approved

Germany: GRE told it could

Netherlands: needs more time to clarify this

6.3. Plastic Glazing (UK): was discussed in Riga (item 5.27)

TAAM agreed solution A in the time

Since this TAAM decision some vehicles are still equipped with plastic glazing

Germany: the majority went for the L marking, the M marking is used in many approvals

The examples in the Riga meeting were not representative for all kinds of windows. We only saw windows in the back of the vehicle and not at the side, but at the side M marking has to be used

Belgium (Patrick): if you see the road, the plastic glazing should be marked with L, but if you don't see the road through the window, it can be M.

UK: can you clarify "what is viewing the road?"

Germany (Frank): the minutes of Riga have to be rewritten to explain what is meant by "seeing the road" and discuss at next TAAM

Ireland: supports Franks vision

Netherlands (Harry): don't has the documents, so finds the discussion difficult to follow. Asks to discuss this in the next TAAM

Next TAAM will be in Luxembourg

For the second half of 2013 we still need a candidate to host – hopefully we'll find a host by the next TAAM

SUMMARY OF PAST TAAM

9 – 11 July 1997	Spain (Madrid)
11 – 12 December 1997	France (Paris)
8 – 10 June 1998	Germany (Flensburg)
19 – 21 January 1999	Luxemburg (Sandweiler)
8 – 10 June 1999	Sweden (Borlänge)
18 – 20 January 2000	United Kingdom (Bistol)
13 – 14 December 2000	The Netherlands (Delft)
6 – 7 June 2001	Norway (Sandvika)
21 - 22 November 2001	European Commission (Brussels)
4 – 5 June 2002	Finland (Tuusula)
16 – 17 December 2002	Belgium (Brussels)
9 – 10 July 2003	Germany (Flensburg)
4 – 5 February 2004	United Kingdom (Bristol)
21 – 22 September 2004	France (Paris)
9 – 10 March 2005	Spain (Madrid)
27 – 28 September 2005	Sweden (Borlänge)
5 – 6 April 2006	Ireland (Dublin)
28 – 29 September 2006	Austria and Hungary (Vienna)
22 – 23 March 2007	The Netherlands (Zoetermeer)
27 – 28 September 2007	Estonia (Tallinn)
9 – 10 April 2008	Germany (Leipzig)
9 – 10 October 2008	United Kingdom (Edinburgh)
26 – 27 March 2009	Switzerland (Bern)
8 – 9 October 2009	Slovenia (Brdo pri Kranju)
3 – 4 June 2010	Bulgaria (Sofia)
23 – 24 September 2010	Romania (Sibiu)
12 – 13 May 2011	Latvia (Riga)
21 – 22 November 2011	Germany, The Netherlands and United Kingdom (Geneva)
26 – 27 April 2012	Slovakia (Bratislava)