

Type Approval Authorities Meeting

22 – 23 May 2014 - Vilnius, Lithuania

Meeting minutes

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AGENDA
22-23 May 2014
Lithuania

- 1. Opening of the Meeting.**
- 2. Adoption of the Agenda.**
- 3. Adoption of the minutes of Geneva (2013) Meeting.**
- 4. Short ETAES report.**
- 5. TAAM participants from non EU/EEA countries.**
- 6. Follow up on questions from previous meetings:**
 - 6.1. Bratislava item 4.4:**

Geneva (2011) item 5.6;
Brussels item 4.4;
Luxembourg item 5.2;
Geneva (2013) item 5.2;
Regulation (ECE) R83.06 and Regulation (EC) 715/2007 on engine setting for type I test (UK)
 - 6.2. Bratislava item 5.6:**

Brussels item 4.6;
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Geneva (2013) item 5.3;
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 - 6.3. Bratislava item 5.26:**

Brussels item 4.9;
Luxembourg item 5.4;
Geneva (2013) item 5.4;
Regulation (ECE) R107.03 and Directive (EC) 2007/46 on exits in buses and coaches (UK)
 - 6.4. Brussels item 5.26:**

Luxembourg item 5.6;
Geneva (2013) item 5.5;
Directive (EC) 2007/46 on multistage EC type approval granted after 29.10.2012 on base of a WVTA not amended by Regulation (EC) 678/2011. Meet Regulation (EC) 678/2011 or not? (Belgium)
 - 6.5. Riga item 5.27:**

Brussels item 6.3
Luxembourg item 5.8 ;

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Plastic glazing (UK)

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ECWVTA certificate of conformity. Directive (EC) 2007/46 – Annex, IX Para 4 and 4.1 (UK 1)

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Emissions for multi-stage vehicles (Romania)

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Geneva (2013) item 5.11;

Repair and maintenance information (Ireland)

6.10 Luxembourg item 6.19:

Geneva (2013) item 5.12;

Foldable device designed to reduce aerodynamic drag (Netherlands)

6.11 Luxembourg item 10.1:

Geneva (2013) item 5.13;

Information of the status of the CoP and Product Safety measures concerning Directive 2006/40/E “MAC” and the new refrigerant R-1234yf (Germany1) KBA report.

6.12. Geneva item 6.4:

Special purpose vehicle which does not enter in any of the definitions mentioned in this section. (Netherlands 5)

7. Questions relating to framework Directive (EC) 2007/46 (motor vehicles):

7.1. Regulation (EC) No. 595/2009 (UNECE Regulation No. 49.06)

PEMS Demonstration Vehicle Category (United Kingdom 1)

7.2. Regulation (EC) No 661/2009, Article 12 (2)

Is ESC required for tractors for semi-trailers of category N1 having 3500 kg permissible maximum mass? (Austria 1)

7.3. Regulation (EU) No. 109/2011

Application of Regulation (EU) 109/2011 for N₁ vehicles (Netherlands 1)

7.4. Regulation (EU) No. 678/2011

Vehicle transporter and recovery vehicle (Latvia 1)

7.5. Regulation (EU) No 1230/2012

Maneuverability requirements for vehicles which are intended for the transport of indivisible loads only. ([Germany 1](#))

**7.6. Regulation (EU) No. 214/2014
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**7.7. Directive 2007/46/EC
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**7.8. Directive 2007/46/EC
Article 18 Certificate of conformity - COC changes management ([France 2](#))**

**7.9. Directive 2007/46/EC
Certificate of Conformity for complete or completed vehicles of category N
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**7.10. Directive 2007/46/EC
Certificate of conformity ([Romania 1](#))**

**7.11. Directive 2007/46/EC
Seating positions for vehicles of the M2, M3 category. ([Lithuania 1](#))**

**7.12. Directive 2007/46/EC
Article 32 - Recall of vehicles ([France 1](#))**

8. Questions relating to framework Directive (EC) 2002/24 or framework Regulation (EU) No. 168/2013 (two or three wheel motor vehicles):

**8.1. Regulation (EU) No. 168/2013 (UNECE Regulation No.78)
Motorcycle ABS off ([United Kingdom 3](#))**

**8.2. Regulation (EU) No. 2013/60
CoC for two wheelers ([Germany 4](#))**

9. Questions relating to framework Directive (EC) 2003/37 (agricultural or forestry tractors):

**9.1. Directive 2009/63/EC
Maximum laden mass T1 and T5 category (4, 5 axle tractors) ([Netherlands 2](#))**

10. Questions relating to UNECE Regulations:

**10.1. UNECE Regulation No. 46.02
Extensions of approvals ([Germany 2](#)) [Add.](#)**

**10.2. UNECE Regulation No. 48 (05/06 series)
Automatic Light Switching ([Germany 5](#))**

**10.3. UNECE Regulation No. 100
Flywheel energy storage ([United Kingdom 2](#))**

10.4. UNECE Regulation No. 107

Locking device on seat intended for a crew member at the front of the bus
([Netherlands 3](#))

10.5. UNECE Regulation No. 107

Folding seats in wheelchair space ([France 3](#))

10.6. UNECE Regulation No. 107

Measurement of Dimension « H », in Class I Vehicle ([France 4](#))

11. Miscellaneous:

11.1. Request for acceptance by the Netherlands of national small series granted by other Member States ([Netherlands 4](#))

12. Next TAAM

Annex I

2nd TAAM RMI sub-group report

1. Opening of the Meeting.

The delegates were welcomed in Lithuania.

2. Adoption of the Agenda.

Agenda adopted after some new questions was introduced in miscellaneous item.

3. Adoption of the minutes of Geneva (2013) Meeting.

There were no requests or remarks for minutes of Geneva (2013) modification received so the final minutes of the meeting were adopted.

4. Short ETAES report.

KBA represented minutes of ETAES.

5. TAAM participants from non EU/EEA countries.

DE suggested that TAAM delegates from non EU/EEA countries won't be invited, but they could attend TAAM in case they want that. And they could only attend friday meetings, where no discussions on Directive (EC) 2007/46 will be held. There was a voting and most of countries agreed with this proposal.

6. Questions from previous meetings

6.1. Bratislava item 4.4: Regulation (ECE) R83.06 and Regulation (EC) 715/2007 on engine setting for type I test (UK)

No new information was delivered for this question so this question can be removed from the agenda of the next meeting.

6.2.Bratislava item 5.6: Directive (EC) 2007/46 on Mobile Air Conditioning (MAC) for special purpose vehicles (UK)

No new information was delivered for this question so this question can be removed from the agenda of the next meeting.

6.3.Bratislava item 5.26: Regulation (ECE) R107.03 and Directive (EC) 2007/46 on exits in buses and coaches (UK)

No new information was delivered for this question so this question can be withdrawn.

6.4.Brussels item 5.26: Directive (EC) 2007/46 on multistage EC type approval granted after 29.10.2012 on base of WVTA not amended by Regulation (EC) 678/2011. Meet Regulation (EC) 678/2011 or not? (Belgium)

Nothing new about this question so this question can be removed from the agenda of the next meeting.

6.5.Riga item 5.27: Plastic glazing (UK)

This question was discussed in GRSG. Basically this item should be linked to UNECE rules.

6.6.Luxembourg item 6.4: ECWVTA certificate of conformity. Directive (EC) 2007/46 – Annex, IX Para 4 and 4.1 (UK 1)

This question is discussed in TCMV. DE and UK will ammend this question due to Regulation (EC) 1230/2012 and will submit a proposal at TCMV.

6.7.Luxembourg item 6.11: Number of seating positions (Netherlands)

This question can be withdrawn from the agenda of the next meeting.

6.8.Luxembourg item 6.12: Emission for multi-stage vehicles (Romania)

This question is solved and can be removed from the agenda of the next meeting because it is described in Regulation (EC) 715/2007 Annex 17.

6.9. Luxembourg item 6.13: Repair and maintenance information (Ireland)

There are new complements in ISO standard. Information about this question is in report sent by DE. This question can be withdrawn from the agenda of the next meeting.

6.10. Luxembourg item 6.19: Foldable device designed to reduce aerodynamic drag (Netherlands)

This question is discussed in TCMV. There is a discussion if the maximum length of these devices should be not longer than 100 mm. This question must be solved in a political level so it can be removed from the agenda of the next meeting.

6.11. Luxembourg item 10.1: Information of the status of the CoP and Product Safety measures concerning Directive 2006/40/E "MAC" and the new refrigerant R-1234yf (Germany1) KBA report.

This question will be discussed in higher level so this question can be removed from the agenda of the next meeting.

6.12. Geneva item 6.4: Special purpose vehicle which does not enter in any of the definitions mentioned in this section. (Netherlands 5)

7. Directive or Regulation number:
- 2007/46/EC
Subject:
Special purpose vehicles
Reference to Annex, etc in the Directive or Regulation:
Annex II, Part A, paragraph 5.8
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 the last session of TAAM the group took the decision that, in case of vehicles that are used during 80% of the year as a tipper but can be used during the winter as a snow plough, the main function of the truck should be considered for the classification. Such vehicles are normal trucks and no special purpose vehicles.

The Dutch delegation has been requested to provide pictures of such vehicles. Such pictures are given below.



Picture 1



Picture 2



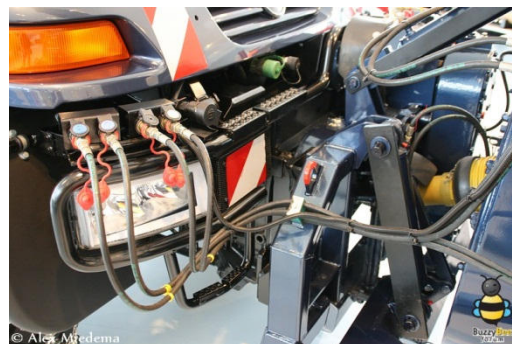
Picture 3



Picture 4



Picture 5



Picture 6

The meeting agreed that these vehicles should have code BA 19, but according to national requirements these vehicles either can have special code SG or not.

7. Questions relating to framework Directive (EC) 2007/46 (motor vehicles)

7.1. Regulation (EC) No. 595/2009 (UNECE Regulation No. 49.06) PEMS Demonstration Vehicle Category (United Kingdom 1)

Legislation

582/2011 as amended by 136/2014, Annex VI
UNECE R49.06, Supplement 1, Annex 10

7.3. In-use testing

A PEMS demonstration test shall be performed at type-approval by testing the parent engine in a vehicle using the procedure described in Appendix 1 to this annex.

7.3.1. The manufacturer may select the vehicle that shall be used for testing but the vehicle choice shall be subject to the agreement of the approval authority. **The characteristics of the vehicle used for the PEMS demonstration test shall be representative for the category of vehicle intended for the engine system.** The vehicle may be a prototype vehicle.

7.3.2. At the request of the approval authority, an additional engine within the engine family or an equivalent engine representing a different vehicle category may be tested in a vehicle.

Discussion

At the time of type approval it is required to carry out a PEMS demonstration test. The intention of PEMS testing is to verify conformity of off-cycle emissions. It is a requirement that the vehicle used shall be representative of the intended vehicle category. The vehicle category determines the trip characteristics that are applied, whereby;

Vehicle Category	Urban [%]	Rural [%]	Motorway [%]
M1 / N1	45	25	30
M2, M3	45	25	30
M2, M3 (Class I, II or A)	70	30	-
N2	45	25	30
N3	20	25	55

The significant difference in trip characteristics means that it can be difficult to confirm conformity between results from different vehicle categories. This is particularly the case when considering the difference between N3 and M3 (Class I, II or A).

It can therefore be viewed that multiple tests are required if the engine family is intended for vehicle categories with different trip characteristics. Multiple tests are not however explicitly required and are instead at the request of the approval authority.

Question

At the time of type approval, should the PEMS demonstration cover all vehicle categories that the engine is intended for?

Option	Possible Solution	
A	Yes, PEMS demonstration needs to be carried out on all vehicle categories the engine is intended for.	
B	No, PEMS demonstration is only required on a representative vehicle.	X

The meeting agreed that PEMS demonstration is only required on a representative vehicles. Although there was made a remark, that sometimes the same engine is mounted in a truck and in a bus, but using conditions of these vehicles differ.

7.2. Regulation (EC) No. 661/2009, Article 12 (2)

Is ESC required for tractors for semi-trailers of category N1 having 3500 kg permissible maximum mass? (Austria 1)

Question:

Is ESC required for tractors for semi-trailers of category N1 having 3500 kg permissible maximum mass ?

Requirements:

Article 12

Electronic stability control systems

1. Vehicles of categories M 1 and N 1 shall be equipped with an electronic stability control system meeting the requirements of this Regulation and its implementing measures.
2. With the exception of off-road vehicles as defined in points 4.2 and 4.3 of Section A of Annex II to Directive 2007/46/EC, the following vehicles shall be equipped with an electronic stability control system meeting the requirements of this Regulation and its implementing measures:
 - (a) vehicles of categories M 2 and M 3 , except for those with more than three axles, articulated buses and coaches, and buses of Class I or Class A;
 - (b) vehicles of categories N 2 and N 3 except for those with more than three axles, tractors for semi-trailers with a gross vehicle mass between 3.5 and 7.5 tonnes, and special purpose vehicles as defined in points 5.7 and 5.8 of Section A of Annex II to Directive 2007/46/EC;

Paragraph 1 says: yes

Paragraph 2 says no – this vehicles having 3.500 tonnes lies at between 3.5 and 7.5 tonnes, but is of category N1

Possible solution:

ESC required or not?

Selection of solution e12:		yes	no
A		X	
B			

The meeting agreed that ESC is required for tractors for semi-trailers of category N1 having 3500 kg permissible maximum mass.

7.3. Regulation (EU) No. 109/2011

Application of Regulation (EU) No. 109/2011 for N1 vehicles (Netherlands 1)

Directive or Regulation number:
- 109/2011.
Subject:
application of Regulation (EU) 109/2011 for N1 vehicles

Reference to Annex, etc in the Directive or Regulation:
Article 1, 2 and Annex IV of Regulation (EU) 109/2011

Text:
<p><i>Article 1:</i> <u>Scope</u> This Regulation applies to vehicles of categories N and O, as defined in Annex II to Directive 2007/46/EC, which are fitted with a spray suppression system, as well as to spray suppression systems intended for fitment to vehicles of categories N and O</p> <p><i>Article 2:</i> (1) 'spray-suppression system' means a system intended to reduce the pulverisation of water thrown upwards by the tyres of a vehicle in motion and which is made up of a mudguard, rain flaps and valances equipped with a spray-suppression device</p> <p><i>Annex IV:</i> 0.1. Category N and O vehicles, with the exception of off-road vehicles as defined in Annex II to Directive 2007/46/EC, shall be constructed and/or fitted with spray suppression systems in such a way as to meet the requirements laid down in this Annex. In the case of chassis/cab vehicles, these requirements may only be applied to the wheels covered by the cab. For vehicles of category N1 and N2 with a permissible maximum laden mass not exceeding 7,5 tonnes, the requirements of Council Directive 78/549/EEC (1) may be applied as alternative to the requirements of this Regulation at the request of the manufacturer.</p>

Question:
<ol style="list-style-type: none"> 1. Do vehicles equipped with wheelguards rather than spray suppression systems, fall under the scope of this Regulation ? In other words, do they need to be approved to this (EU) Regulation ? 2. In case the answer to Q1 is yes, which approval must be used in the Part 3 list of the WVTA for vehicles of category N1 ?

Solutions Q1:		
A	no approval needed, mention "N/A" in part 3 under item 43A.	the scope indicates that the regulation applies to vehicles which are fitted with a spray suppression system. These N1/N2 vehicles are not fitted with a spray suppression system meeting the definition of Article 2; instead they are equipped with wheel guards meeting the requirements of Directive 78/549 (or alternatively 1009/2010)
B	approval needed	Annex IV section 0.1 states that all vehicles must be equipped with spray suppression system. The requirements of 78/549 (or alternatively 1009/2010) can be used as alternative to show compliance

Solutions Q2:

A	approval acc. to 109/2011	acc. to Annex IV section 0.1, all vehicles of category N shall be constructed and/or fitted with spray suppression systems. The requirements of 78/549 may be applied as alternative to meet the requirements of 109/2011.
B	approval acc. to 78/549	vehicle type has approval (as M1) acc. 78/549 (or alternatively 1009/2010)

Decision:

<i>Solution Q1</i>	<i>Accepted</i>	<i>Refused</i>
A	X	
B		

<i>Solution Q2</i>	<i>Accepted</i>	<i>Refused</i>
A	X	
B		

Authority:

Type approval Authority e/E	4
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Remarks:

RDW has noticed that some Type Approval Authorities refer to M1 approvals issued acc. to Directive 78/549 (or Regulation (EU) 1009/2010) to show compliance with the requirements of Regulation (EU) 109/2011. The scope of Directive 78/549 (or Regulation (EU) 1009/2010) only covers vehicle category M1; therefore we believe it is not correct to refer to an approval that is out of the scope of application. The situation where no approval acc. to 109/2011 is present for a vehicle type that must fulfil the requirements of this Regulation (EU) could result in the vehicle being indicated as non-compliant, since only off-road vehicles are exempted from this requirement (N_xG). Since November 1st 2014 will be a trigger for checking compliance with GSR requirements, RDW would like to get the opinion of other TAA members in this regard.

TAAM agreed that for question 1 answer is A: no approval is needed and it can be mentioned „N/A“ in part 3 under item 43A, but it stand only for old types. For new types approval is needed. For question 2 answer is A (only for new types): all vehicles of category N shall be constructed and/or fitted with spray suppression systems. The requirements of 78/549 may be applied as alternative to meet the requirements of 109/2011.

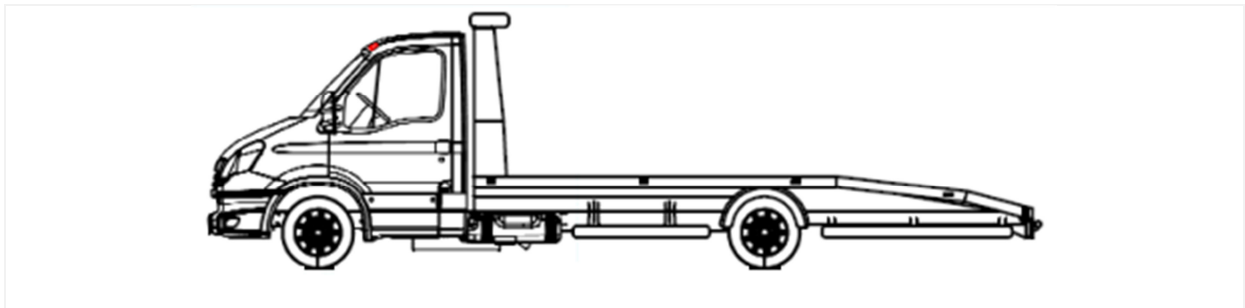
7.4. Regulation (EU) No. 678/2011 Vehicle transporter and recovery vehicle (Latvia 1)

Issue

Commission Regulation (EU) No 678/2011 defines digits used to supplement the codes to be used for various kinds of bodywork given in the Appendix 2 of Annex I. It includes code 14 for “vehicle transporter” and code 24 for “recovery vehicle”. It is clear for classic “vehicle transporter” which carries several vehicles, or “breakdown vehicle”, which does not raise uncertainties.

Taking into account that design and equipment of both above mentioned bodyworks is not defined, manufacturer of the vehicle is able to assign code 14 or 24 practically for the same vehicle which differs only in the use of it. According to different national requirements recovery vehicle shall be marked with special signs (retro reflecting or not), amber warning lights or other distinguishing signs, which are not in line with or not covered by the EC WVTA requirements.

Question 1: Can the vehicle given below be approved (EC WVTA) as “vehicle transporter” or “recovery vehicle”?



Question 2: If vehicle can be approved as recovery vehicle, what code should be assigned for this bodywork – BA (lorry) 24 or SG (special purpose vehicle) 24?

Possibilities of solution

Comments

Question 1

A	Vehicle transporter	
B	Recovery vehicle	What additional equipment or distinguishing signs should be used?
C	Both	Depending on manufacturer`s point of view
		Depending on the wishes of customer
		Depending on the installed additional equipment or distinguishing signs

Type approving authority "e" **32**

Selection of solution		accepted	refused
	A		

	B		
	C	X	

Question 2

A	BA (lorry)	X
B	SG (special purpose vehicle)	

Other opinion / comment:

The meeting agreed for question 1 answer is C: vehicles given in a picture can be approved as vehicle transporter or recovery vehicle, but only depending on the installed additional equipment or distinguishing signs. Answer for question 2 is A: if vehicle is approved as recovery vehicle, for this bodywork should be assigned code BA (lorry) 24. Although there was made a remark, that code BA (lorry) 14 may also be used.

7.5. Regulation (EU) No. 1230/2012

Maneuverability requirements for vehicles which are intended for the transport of indivisible loads only (Germany 1)

Issue:

According to Article 6 of Regulation (EU) No. 1230/2012 an EC type-approval may be granted for vehicles exceeding the maximum permissible dimensions of annex I, but no derogation regarding the manoeuvrability requirements is mentioned

In Directive 97/27/EC Article 7 is written:

By way of derogation from Article 2 and section 7.3 of Annex I, and **without the requirements of section 7.6 of Annex I (manoeuvrability) having to be fulfilled**, Member States may approve vehicles with dimensions exceeding those laid down in those sections. Details of the derogation shall be included in the type-approval certificate in Annex III to this Directive and the provisions of Article 3 shall apply.

Article 6 CR (EU) 1230/2012:

Without prejudice to Article 4(3) of Directive 96/53/EC, an EC type-approval may be granted for vehicles the dimensions of which exceed the requirements of this Regulation that are intended for the transport of indivisible loads. In such a case, the type-approval certificate and the certificate of conformity shall clearly indicate that the vehicle is intended for the transport of indivisible loads only.

References:

Directive 97/27/EC Article 7 and Regulation (EU) 1230/2012 Article 6 :

Questions:

What is the opinion of other TAA?

Do vehicles for indivisible loads have to fulfil the manoeuvrability requirements according to Annex I CR (EC) 1230/2012 or should Article 6 be amended to like it was in Article 7 of 97/27/EC?

Possibilities of solution

Comments

1	A	Article 6 is correct and manoeuvrability requirements have to be fulfilled.	In practice an approval for long vehicle for indivisible loads would not be possible.
	B	Article 6 should be amended to read "...without manoeuvrability requirements...".	For certain kinds of vehicle exceeding the maximum permissible dimensions of annex I an approval would be possible again.

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

TAAM agreed that EC type approval must fulfil requirements of Directive 2007/46/EC Annex 11 and there cannot be vehicles approved higher than 4 meters. So the correct answer for this question is A. Although, the meeting made a remark that vehicles higher than 4 meters can have national or individual type approval.

7.6. Regulation (EU) No. 214/2014 Seats in Mobile homes (Germany 3)

Issue:

Commission Regulation (EU) 214/2014 comprises a modification of Annex XI of framework directive 2007/46/EC. That modification allocates the following meaning to note “G”:

„In case of multi-stage approval, requirements according to the category of the base/incomplete vehicle (e.g. the chassis of which was used to build the special purpose vehicle) may also be used. “

The current text of note “G” reads:

„Requirements according to the category of the base/incomplete vehicle (the chassis of which was used to build the special purpose vehicle). In the case of incomplete/completed vehicles, it is acceptable that the requirements for vehicles of the corresponding **category N (based on max. mass)** are satisfied. “

Krafftahrt-Bundesamt received information that motor-caravan manufacturers, based on the modification stated in commission document D02824/02 (especially omission of “**based on max. mass**”), again consider to apply for type-approvals for motor-caravans equipped with side-facing seats. In this applications class N2 or N3 vehicles will be employed as incomplete vehicles.

Stipulations regarding side-facing seats can be taken from directive 2005/39/EC amending directive 74/408/EEC. Stimulations to the same effect can as well be taken from the 08 series of amendments of UN Regulation 17.

It was not the aim of directive 2005/39/EC to allow side-facing seats in special classes of vehicles but to ban side-facing seats from certain classes. The idea was to define a common proceeding of all EC member states at a point of time, when a whole vehicle type-approval for the vehicle of the classes in question still was not possible. (See consideration 5)

Directive 2005/39/EC does not provide any regulations for the classes N2 and N3. But it states „Research has shown that it is not possible to provide side-facing seats with safety belts ensuring the same level of safety to the occupants as front-facing seats.” (See consideration 8)

While side-facing seats are prohibited in vehicles of class N1, no regulations are given for side-facing seats in vehicles of the classes N2 and N3.

References:

Directive 2007/46/EC, Commission Regulation (EU) 214/2014 and directive 2005/39/EC

Questions:

Is it possible to grant a whole vehicle type-approval for a motor-caravan class M1 using a base vehicle type of class N2 or N3 in case, that the base vehicle type is equipped with side-facing seats?

Possibilities of solution

Comments

1	A	A type-approval for a motor-caravan, class M1 using an incomplete type of vehicle of class N2 or N3 equipped with side-facing seats can be granted.	Directive 2005/39/EC amending directive 74/408/EEC contains a ban of side-facing seats only in case that the incomplete vehicle types belongs to class N1.
	B	A type-approval for a motor-caravan, class M1 using an incomplete type of vehicle class N equipped with side-facing seats can not be granted.	<p>Directive 2005/39/EC amending directive 74/408/EEC contains no stipulations concerning vehicle types that belong to the classes N2 and N3.</p> <p>However side-facing seats are described as not ensuring the same safety level as front facing seats.</p> <p>Directive 2005/39/EC does neither regulate on nor allow side-facing seats in types of vehicles that belong to the classes N2 and N3.</p>

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

This question is for discussion on TCMV for making additions to note „G“ in Commission Regulation (EU) 214/2014.

7.7. Directive 2007/46/EC

Final multi stage type-approval package (Poland)

Background:

Final type-approval packages are put in the ETAES in PDF file format. Multi stage approvals often use references to previous stage(s) in their information documents in order to avoid multiplication of data and unnecessary effort (e.g. reference to engine, brakes, tyres data which remained unchanged in comparison to the base vehicle). Very often subsequent approval stage is done by another Type-Approval Authority. In order to have a complete set of data there is a need to combine current and previous stage approval PDF files. Several TAA secure their PDF files so it's not possible.

Question:

It's not an issue when the PDF file is not protected from combining, but what is the common practice in exchange of unsecured PDF files between different TAAs?

	<u>Suggested solutions:</u>	<u>Yes</u>	<u>No</u>
1	Provide a direct contact person(s) responsible for this matter in each TAA (table in TAAM minutes).	X	
2	Secure PDF files so merging feature is allowed.	X	
3	Don't secure PDF files at all (some TAA already act this way).	?	?

Additional comments:

TAA code: „e”
 „E”

Selection of solution		accepted	refused
	A	X	
	B		
	C		

The meeting agreed that correct answer is A and that ETAES will be supplemented by XML scheme.

7.8. Directive 2007/46/EC

Article 18 Certificate of conformity – COC changes management (France 2)

LEGISLATION

Several recently published texts modify the content of the COC. This is the case of the last EC Regulation 133/2014, 136/2014, 214/2014.

Regulation	COC change dates
133/2014	July 1st, 2014
136/2014	January 1st, 2015
214/2014	November 1st, 2014

DISCUSSION

French manufacturers express difficulties to apply these successive regulatory changes in a short amount of time.

It would be easier to manage these changes if they were held annually or half-yearly.

QUESTION 1 :

Do other Members States share this observation from manufacturers?

Option	Solution	Accept	Reject
1	We don't have this observation from our manufacturers		
2	We have this observation from our manufacturers		

QUESTION 2 :

Is it necessary, in the future, to limit changes of COC at 1 or 2 times per year ?

Option	Solution	Accept	Reject
1	No : Continue as currently		
2	Yes : Define annual ou half-yearly evolution steps of COC		

Decision:

<i>Solution Q1</i>	<i>Accepted</i>	<i>Refused</i>
1		
2		
<i>Solution Q2</i>	<i>Accepted</i>	<i>Refused</i>
1	X	
2		

The meeting agreed that question 1 about sharing observation from manufacturers should be discussed at Commission working parties (TCMV). And the answer for the question 2 is **Yes**: there should be defined annual evolution steps of CoC (for example 1 October).

7.9. Directive 2007/46/EC
Certificate of Conformity for complete or completed vehicles of Category N
(Sweden 1)

SUBJECT: Certificate of Conformity for complete or completed vehicles of category N

REGULATION: 2007/46/EC

RELEVANT SECTION: Annex IX, Side 2, points 1. and 1.1.

1. Number of axles: and wheels:

1.1. Number and position of axles with twin wheels:

QUESTION:

How should the number of wheels be filled in? This issue was a question from RDW at TAAM in Riga in 2011.

The solutions suggested from the RDW were:

One interpretation is that a twin wheel shall be counted as one wheel. The entries on the CoC, in case of for example a vehicle with one front axle with single wheels and one rear-axle with twin wheels shall then be:

1. Number of axles:2..... and wheels:4.....

1.1. Number and position of axles with twin wheels:1/2.....

The other interpretation is that a twin wheel is counted as two wheels. The entries on the CoC shall then be:

1. Number of axles:2..... and wheels:6.....

1.1. Number and position of axles with twin wheels:1/2.....

According to the report the solution *twin wheels shall be counted as two wheels* was accepted. It seems though that the manufacturers still fill in this differently. This gives a problem when the vehicles are registered.

Has the point of view changed or is TAAM still of the meaning that a twin wheel shall be counted as two wheels.

A	Twin wheels shall be counted as one wheel	
B	Twin wheels shall be counted as two wheels	

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Selection of solution		accepted	refused
	A		
	B		

TAAM had no common opinion about this question. There was a proposal that information about number of wheels is not necessary in CoC. This proposal will be carried for Commission. But for this day number of wheels in CoC must be indicated.

7.10. Directive 2007/46/EC Certificate of conformity (Romania 1)

Facts:

Checking lots of C.o.C. presented us we have noticed there are many approaches concerning the date of issue these documents which rise by one hand questions about the date of production of the vehicle and by the other hand questions about the management of the procedure of issue the C.o.C.

Text:

Article 3, point 36

„certificate of conformity’ means the document set out in Annex IX, issued by the manufacturer and certifying that a vehicle belonging to the series of the type approved in accordance with this Directive complied with all regulatory acts **at the time of its production;**”

Annex XII Small series and end-of-series limits, point B

„2. vehicles of any one type shall be restricted to those for which a valid certificate of conformity was issued **on or after the date of manufacture** and which remained valid for at least three months after its date of issue but subsequently lost its validity due to the entry into force of a regulatory act.”

ANNEX IX EC Certificate of conformity, point 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.**”

Question 1: should the date of issue the CoC (see point 10 of the CoC) reflect the date of production?

Solution	accepted	refused
Yes	X	
No		

Question 2: if the answer is “no”, how do the authorities know when the vehicle was produced (for instance: to check if the vehicle in cause complies with the requirements of Annex XII for end-of-series)?

Comments: the text from Annex XII” seems to be inconsistent face to the texts of Article 3 and of Annex IX (see the bold texts).

This question is the most important when it is needed to apply end of series procedure, because date on CoC and the vehicle production date vary. The answer for question is 1 is Yes, the date of issue of CoC should reflect the date of production. This requirement for date could be indicated in new Directive 2007/46/EC edit. And TAA should get additional data from manufacturer if it has doubt about date of production or additional data is needed. Because the answer for question 1 is „yes“, question 2 is no need to discuss.

7.11. Directive 2007/46/EC

Seating positions for vehicles of the M2, M3 category (Lithuania 1)

Issue

Item 9.10.3.1 of the Annex I and III of the Directive 2007/46/EC require specifying number of seating positions.

Legislation:

Definition on the Directive 74/408/EEC:

2.5. 'Seat' means a structure likely to be anchored to the vehicle structure, including its trim and attachment fittings, intended to be used in a vehicle and to seat one or more adult persons.

Depending on its orientation, a seat is defined as follows:

2.5.1. 'Forward-facing seat' means a seat which can be used whilst the vehicle is in motion and which faces towards the front of the vehicle in such a manner that the vertical plane of symmetry of the seat forms an angle of less than + 10° or - 10° with the vertical plane of symmetry of the vehicle;

2.5.2. 'Rearward-facing seat' means a seat which can be used whilst the vehicle is in motion and which faces towards the rear of the vehicle in such a manner that the vertical plane of symmetry of the seat forms an angle of less than + 10° or - 10° with the vertical plane of symmetry of the vehicle;

2.5.3. 'Side-facing seat' means a seat which, with regard to its alignment with the vertical plane of symmetry of the vehicle, does not meet either of the definitions given in 2.5.1 or 2.5.2 above;

Definition on the UNECE regulation No. 80:

2.5. 'Seat' means a structure likely to be anchored to the vehicle structure, including its trim and attachment fittings, intended to be used in a vehicle, and to seat one or more adult persons.

Depending on its orientation, a seat is defined as follows:

2.5.1. 'Forward-facing seat' means a seat which can be used while the vehicle is in motion and which faces towards the front of the vehicle in such a manner that the vertical plane of symmetry of the seat forms an angle of less than + 10° or - 10° with the vertical plane of symmetry of the vehicle.

2.5.2. 'Rearward-facing seat' means a seat which can be used while the vehicle is in motion and which faces towards the rear of the vehicle in such a manner that the vertical plane of symmetry of the seat forms an angle of less than + 10° or - 10° with the vertical plane of symmetry of the vehicle.

2.5.3. 'Side-facing seat' means a seat which can be used whilst the vehicle is in motion and which faces towards the side of the vehicle in such a manner that the vertical plane of symmetry of the seat forms an angle of 90° (± 10°) with the vertical plane of symmetry of the vehicle;

Question: Is the folding seats counted specifying number of seating positions?

Possibilities of solution

Comments

A	Yes	All “seats” should be included in the main seats number
B	No	Folding seats should not be counted as “seats”
C	Other	

Type approving authority "e"	36
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Selection of solution		accepted	refused
	A		
	B		
	C		

Other opinion / comment:

There are any definition of the folding seat in the legislation.

There was no particular conclusion on this question made. This question may be discussed in Brussels when recasting Directive 2007/46/EC. And for now remarks in CoC can be made indicating how many main seats there are and how many foldable seats.

7.12. Directive 2007/46/EC

Article 32 – Recall of vehicles (France 1)

LEGISLATION

Article 32 - Recall of vehicles

1. Where a manufacturer who has been granted an EC vehicle type-approval is obliged, in application of the provisions of a regulatory act or of Directive 2001/95/EC, to recall vehicles already sold, registered or put into service because one or more systems, components or separate technical units fitted to the vehicle, whether or not duly approved in accordance with this Directive, presents a serious risk to road safety, public health or environmental protection, he shall immediately inform the approval authority that granted the vehicle approval thereof.

2. The manufacturer shall propose to the approval authority a set of appropriate remedies to neutralise the risk referred to in paragraph 1. **The approval authority shall communicate the proposed measures to the authorities of the other Member States without delay.** The competent authorities shall ensure that the measures are effectively implemented in their respective territories.

DISCUSSION

French TAA has difficulties to transmit recalls on vehicles to the other Member States according to Article 32, because the contact list is not up to date.

QUESTION :

Can each TAA communicate the contact person for recall of vehicles, according to Article 32 ?

Option	Solution	Accept	Reject
1	Establish an updated list of contacts	X	

This question was also discussed during ETEAS meeting. Conclusion for this question: the meeting decided that FI with help of UK will make form of list of persons who are responsible for recall of vehicles and the list will be stored in Excel sheet (*.xlsx).

8. Questions relating to framework Directive (EC) 2002/24 or framework Regulation (EU) No. 168/2013 (two or three wheel motor vehicles):

8.1. Regulation (EU) No. 168/2013 (UNECE Regulation No. 78) Motorcycle ABS off (United Kingdom 3)

Legislation

168/2013 Annex VIII

- (a) new motorcycles⁽²²⁾ of the L3e-A1 subcategory which are made available on the market, registered and entering into service are to be equipped with either an anti-lock or a combined brake system or both types of advanced brake systems, at the choice of the vehicle manufacturer;
- (b) new motorcycles of subcategories L3e-A2 and L3e-A3 which are made available on the market, registered and entering into service to be equipped with an anti-lock brake system.

Exemption:

L3e-AxE (x = 1, 2 or 3, two-wheel Enduro motorcycles) and L3e-AxT (x = 1, 2 or 3, two-wheel Trial motorcycles) are exempted from the obligatory fitting of advanced brake systems.

Discussion

Braking requirements are covered in ECE R78, but 168/2013 mandates ABS for some categories even though it is not mandated in ECE R78. Hence some possibilities are not covered in ECE R78

Question

1. Can motorcycles fitted with mandatory ABS have an ABS off function?

Question 1 ABS off (ABS mandatory)

Option	Possible Solution	
A	Allowed – (not covered in R78 or 168/2013)	X
B	Not allowed - (not covered in R78 or 168/2013)	

The meeting agreed that answer for this question is A: ABS of is allowed, but in default mode it must be on. There was a remark that if Commissions opinion will vary for this question, Regulation (EU) No. 168/2013 will have to be changed. There also was Commissions answer that vehicles type can be approved if ABS is fitted for only one wheel.

8.2. Regulation (EU) No. 2013/60 CoC for two wheelers (Germany 4)

Issue:

The above mentioned Regulation is introducing amongst other changes new emission levels for vehicles of category L1e, L2e and L6e.

Do manufacturers have to change CoCs for those types which do not fall under the provisions of Reg (EU) No.2013/60/EU according to point 46 of the CoC (see Annex II, 1(a))?

The changes apply only for new types!

Changes are for example:

The description of Euro Levels (1, 2, 3) is mentioned in 46.1, 46.2, 46.3

Recital (6) of reg (EU) No. 2013/60/EU says:

„Certificates of Conformity for vehicles with an emission approval in accordance with previous provisions should continue to be allowed to indicate the Euro level on a voluntary basis“.

This recital stipulates the use of the former CoC template should be allowed.

There is a sentence which may be in contradiction with this:

Article (4),2 of Reg (EU) No. 2013/60/EU:

„With effect from 1 July 2014 Certificates of Conformity shall be issued for vehicles complying with the provisions of directive 97/24/EC as amended by point 1 of Annex II to this directive“,

Therefore also existing types may have to be delivered with the new CoC although not approved under the new provisions. (that means with EURO levels).

References:

Regulation (EU) 2013/60 Recital (6) and Art.4 :

Questions:

Would you (your MS registration authority) reject an CoC based on the obligations prior to the changes of Reg (EU) No. 2013/?

Possibilities of solution

Comments

1	A	The CoC based on the previous provisions is valid for vehicles not being approved under Reg (EU) No. 2013/60	
	B	The new CoC apply for all vehicles after the 1 st of July 2014.	

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Selection of solution		accepted	refused
	A	x	
	B		x

DE, UK, FR is in favour for solution A and will not reject a CoC based on the obligations prior to the changes of Regulation (EU) No. 2013/60.
AT is strongly object solution A.

9. Questions relating to framework Directive (EC) 2003/37 (agricultural or forestry tractors):

9.1. Directive 2009/63/EC

Maximum laden mass T1 and T5 category (4, 5 axle tractors) (Netherlands 2)

Directive or Regulation number:

2009/63/EC

Subject:

Maximum laden mass T1 and T5 category (4, 5 axle tractors)

Reference to Annex, etc in the Directive or Regulation:

Annex I, paragraph 1.2. (see below)

Text:

1.2. the maximum permissible laden mass and the maximum permissible mass per axle depending on the vehicle category does not exceed the values given in Table 1.

Table 1

Maximum Permissible Laden Mass and Maximum Permissible Mass per Axle Depending on the Vehicle Category

Vehicle category	Number of axles	Maximum permissible mass (t)	Maximum permissible mass per axle	
			Driven axle (t)	Non-driven axle (t)
T1, T2, T4.1	2	18 (laden)	11,5	10
	3	24 (laden)	11,5	10
T3	2 or 3	0,6 (unladen)	(^a)	(^a)
T4.3	2, 3 or 4	10 (laden)	(^a)	(^a)

(^a) It is not necessary to establish an axle limit for vehicle categories T3 and T4,3, as they have by definition limitations on the maximum permissible laden and/or unladen mass.

Question:

Q1: What is the maximum permissible mass for a T1 category tractor with 4 and/or 5 axles

Q2: What is the maximum permissible mass for a T5 category tractor (with 4 and/or 5 axles)

Solutions:

Q1 A	T1 tractors with 4 or 5 axles will get the same maximum permissible mass as a 3 axle tractor
Q1 B	T1 tractors with 4 or 5 axles will follow the mass and dimension legislation from commercial vehicles (1230/2012)
Q1 C	The maximum permissible mass for T1 tractors with 4 or 5 axles has to be defined with the next amendment of the legislation
Q2 A	T5 tractors (with 4 or 5 axles) will get the same maximum permissible mass as a T1 tractor (with 3 axles)
Q2 B	T5 tractors will follow the mass and dimension legislation from commercial vehicles (1230/2012)
Q2 C	The maximum permissible mass for T5 tractors with 4 or 5 axles has to be defined with the next amendment of the legislation

Decision:

<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
Q1 A	X	
Q1 B		
Q1 C		
Q2 A		
Q2 B		
Q2 C		

Authority:

Type approval Authority e/E

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Remarks:

The meeting decided that the answer for question 1 is A: the maximum permissible mass for a T1 category tractor with 4 and/or 5 axles is the same as for T1 category tractors with 3 axles. For question 2 there is no particular answer because maximum permissible mass for T5 category tractor is not harmonized so this mass can be estimated in each country individually.

10. Questions relating to UNECE Regulations:

10.1. UNECE Regulation No. 46.02 Extensions of approvals (Germany 2)

Information:

The 105th session of GRSG has adopted the documents TRANS/WP.29/GRSG/2013/18 and ECE/TRANS/WP.29/GRSG/2013/19 with amendments. Following these amendments manufacturers may continue to apply for extensions to 01 and 02 series of amendments of UN Reg. R46 for existing approvals. These changes do clarify the possibility to make extensions also for that series of amendments.

Entry into force of the documents is expected for the end of 2014. So manufacturers would have to prepare new markings for their products (e.g. outside rear view standard mirrors) in the meantime until they will be able again to use the today existing approvals.

müssten daher bei zwischenzeitlich gestellten Erweiterungsanträgen die Produkte. This will create an unwanted financial burden for the manufacturer.

The KBA understands the amendments as a clarification and will therefore carry on already now to grant extensions to these existing approvals.

References:

ECE/TRANS/WP.29/GRSG/2013/18 and ECE/TRANS/WP.29/GRSG/2013/19 as amended

See annex Annex_GER-2_1 and Annex_GER-2_2

The meeting agreed that markings for the products must stay the same.

10.2. UNECE Regulation No. 48 (05/06 series) Automatic Light Switching (Germany 5)

Issue:

1. Interpretation (KBA view)

Until UN R48 04 series the electrical switching provisions have been described without detailed numbering under point 6.2.7.

6.2.7. *Electrical connections*

The control for changing over to the dipped-beam must switch off all main-beam headlamps simultaneously.

The dipped-beam may remain switched on at the same time as the main beams.

In the case of dipped-beam headlamps according to Regulation No 98, the gas-discharge light sources shall remain switched on during the main-beam operation.

One additional light source, located inside the dipped-beam headlamps or in a lamp (except the main-beam headlamp) grouped or reciprocally incorporated with the respective dipped-beam headlamps, may be activated to produce bend lighting, provided that the horizontal radius of curvature of the trajectory of the centre of gravity of the vehicle is 500 m or less.

This may be demonstrated by the manufacturer by calculation or by other means accepted by the authority responsible for type approval.

Dipped-beam headlamps may be switched ON or OFF automatically. However, it shall be always possible to switch these dipped-beam headlamps ON and OFF manually.

The last entry (in bold) is since 05 series now No.6.2.7.5 which applies still without restrictions for vehicles without DRL.

The new provision 6.2.7.6 entering into force with the 05 series restricts the application of 6.2.7.5 if DRL is installed (see justification to 6.2.7.6, last sentence: „*but they must not interfere with the requirements for day-night automatic switching*“). The 05 series have been amended especially in the light of clarifying the automatic switching functions. The justification to paragraph 6.2.7.6 – to be applied when DRL is installed in the vehicle – is the main reason for the changes in 05 series. The Prop. Supplement 5 to 04; GRE/2009/34 (see Annex) explains the mandatory provisions of the automatic switching of the dipped-beam for specific ambient conditions (see Annex 13) after a transitional period. This automatic switching shall provide the activation of the dipped-beam during night or other similar unsighted conditions (mist, severe rain..)!

Paragraph 6.2.7.5 is giving the manufacturer the possibility to install switching logics in his vehicle which allow under specific temporary conditions (<10kph...) to switch off manually the driving-beam/dipped-beam (see also justification GRE/2009/34 to Paragraph 6.19.7.2) This switching provision was discussed during the TAAM 2013 in Luxemburg (Agenda item 9.2). It was the agreed understanding of the TAAM group, that e.g. during the stand-still in front of a railway barrier or during the check/control by a police officer the driving beam need to be switched off manually. The switching provisions for the DRL in 6.2.19 are showing the intended use in temporary situations. (last sentence in a.m. justification).

The primary intended approach of these provisions shall be, that the often seen wrong illumination/lighting of the vehicles – DRL during the night time, especially missing position and lamps and rear lighting and glare to approaching vehicles – will be solved by automatic switching functions! Miss-switching by the

driver shall be made impossible. Often the driver may not recognize during the night that he is driving with DRL on only - means the lighting described in 5.11 are also not on! (Position, rear lamps...) This phenomenon is supported by the today's illumination of the instrument lights during day-time conditions.

For a transitional period of 66 months, Interim-switching conditions are accepted (see 6.2.7.6.2-3), which allow specific combinations of lamps (position-lamps and DRL...) After this period the above explained automatic switching function is mandatory!

2. Interpretation

Point 6.2.7.5 is always to be realized by the manufacturer and seen as an ultimate provision which always allows to switch off the dipped-beam manually! This may lead to a situation where at night the 5.11 lights and dipped-beam is off and DRL is on!!

References:

UN R48 05 and 06 series and

GRE/2009/34 with justifications of 05 series (former proposed as suppl.5 to 04 series..)

Questions:

Will the TAAM follow the above mentioned interpretation 1. or follow instead the understanding No. 2?

Possibilities of solution

Comments

1	A	The provision 6.2.7.6 as the main reason for the amendments of 05 series clarifies the electrical switching provisions which as a consequence overrules 6.2.7.5 when DRL is installed	Provisions 6.2.7.6 is the newer provisions which clarifys the automatic switching provisions and 6.2.7.5 may only apply under circumstances described in 6.19.7.2. (see also TAAM Lux 9.2)
	B	Provision 6.2.7.5 always applies and therefore switching off the dipped-beam e.g. at night could happen with activation of DRL at the same time. Provision 6.2.7.5 is therefore seen as an ultimate provision.	Provision 6.2.7.5 is written in a way that an interpretation may arise that it is in contradiction with 6.2.7.6 result in contrary legislation.

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

TAAM agreed that for being moment both answer A and B are possible, but in the future this question must be clarified.

10.3. UNECE Regulation No. 100 Flywheel energy storage (United Kingdom 2)

Legislation

2.29. "Rechargeable energy storage system (REESS)" means the rechargeable energy storage system that provides electric energy for electric propulsion. The REESS may include subsystem(s) together with the necessary ancillary systems for physical support, thermal management, electronic control and enclosures.

2.36. "Type of REESS" means systems which do not differ significantly in such essential aspects as:

- (a) the manufacturer's trade name or mark,
- (b) the chemistry, capacity and physical dimensions of its cells,
- (c) the number of cells, the mode of connection of the cells and the physical support of the cells,
- (d) the construction, materials and physical dimensions of the casing and
- (e) the necessary ancillary devices for physical support, thermal management and electronic control.

Discussion

We would like to enquire about the use of flywheel-based energy storage within R100.02.

The energy storage device is a self-contained unit containing a motor/generator, flywheel, and control electronics. Electrical energy can be fed in, it is converted internally to kinetic energy, and it can be extracted by converting back to electric energy. This could be seen as analogous to a conventional battery, where the energy is converted internally into chemical energy.

The definition of REESS above seems to have been specifically drafted so as to include types of device other than a conventional battery. However, the definition of "Type of REESS" seems to infer a chemical system:

From a safety point of view, similar issues are present in that a large amount of energy is stored which would be dangerous if released in an uncontrolled fashion. The tests for a REESS are as follows:

- Vibration
- Thermal shock and cycling
- Mechanical impact
- Fire resistance
- External short circuit protection

Overcharge protection
Over-discharge protection
Over-temperature protection
Emissions

The majority of these could be applied to a flywheel device (although not all), however the pass criteria for most tests are absence of:

- (a) Electrolyte leakage,
- (b) Rupture (applicable to high voltage REESS(s) only),
- (c) Fire,
- (d) Explosion.

(a) is clearly not relevant for a flywheel.

Question

Can a flywheel-based energy storage system be considered to be within the scope of R100.02.

Option	Possible Solution	
A	A: A flywheel is an 'energy storage system that provides electric energy for electric propulsion' and is therefore a REESS. Tests, test procedures, and pass criteria should be applied to the greatest extent relevant/possible.	
B	The definition of type and the pass criteria for tests imply that only chemical-based devices are in scope – there are no specific requirements for flywheels.	
C		
D		

The meeting agreed that a flywheel-based energy storage system cannot be considered to be within the scope of Regulation 100.02, so the answer for this question is B.

10.4. UNECE Regulation No. 107

Locking device on seat intended for a crew member at the front of the bus (Netherlands 3)

Directive or Regulation number:
Regulation No. 107
Subject:
Locking device on seat intended for a crew member at the front of the bus

Reference to Annex, etc in the Directive or Regulation:
Paragraph 7.7.1.8, 7.7.1.8.2 and 7.7.1.8.4 in Annex III of Regulation No. 107

Text:
<p>7.7.1.8. However, one or more folding seat(s) for use by the crew may obstruct the access passage to a service door when in the position of use provided that:</p> <p>7.7.1.8.2. When the seat is not in use it folds automatically as necessary to enable the requirements of paragraphs 7.7.1.1. or 7.7.1.2. and 7.7.1.3., 7.7.1.4. and 7.7.1.5. to be met;</p> <p>7.7.1.8.4. When the seat is in the position of use, and when it is in the folded position, no part of it shall be forward of a vertical plane passing through the centre of the seating surface of the driver's seat in its rearmost position and through the centre of the exterior rear-view mirror mounted on the opposite side of the vehicle.</p>

Question:
The folding seat intended for a crew member at the front of the bus was positioned in such a way that it obstructed passage to the front service door. Is it accepted when the folding seat only folds by operating a locking device, e.g. a locking pedal at the bottom of the seat structure?

Solutions:		
A	Yes. It is accepted.	<p>A folding seat for crew that is folded as a whole (seat + seat back) must always be in the locked position in order not to put at risk the safety of the person sitting on the seat, because safety belt anchorage points are attached to this seat, too.</p> <p>Paragraph 7.7.1.8.2. does not provide how automatically this seat should fold when not in use. Therefore automatic folding may also mean folding of the seat for crew, which will return the seat to the folded position after deactivation of the locking device (e.g. by pressing the locking device pedal) which maintains the seat in the tipped-back position, automatically without need of application of physical force by the operator (e.g. using the force accumulated in the return spring).</p> <p>Comparable situation: Paragraph 7.7.5.3.: "... the operation of a control on each seat, readily accessible to a person standing in the gangway, shall be sufficient to cause the seat to return easily and, if possible, automatically ..." It means that a seat with the operation of control can be regarded as a seat that returns automatically.</p>
B	No. It is not accepted	The seat is in use the moment a crew member sits on it. The seat is no longer in use as soon as the crew member stands up

		<p>and the seat should then fold automatically.</p> <p>7.7.5.3. as a comparable situation does not apply because the automatic sideways movement of those seats is linked to the condition of a construction which is easily accessible for a person standing in the gangway.</p> <p>Paragraph 7.7.1.8.2 does not refer to a locking device and the way such a device should be operated.</p>
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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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Remarks:

An application has been submitted for a Dutch registration certificate for a bus based on an European type approval. While processing the registration certificate application, it was ascertained that the seat intended for a crew member at the front of the bus was positioned in such a way that it obstructed passage to the front service door.

Type approval authorities decided that answer for this question is B: it is not accepted when the folding seat only folds by operating a locking device.

10.5. UNECE Regulation No. 107 Folding seats in wheelchair space (France 3)

LEGISLATION :

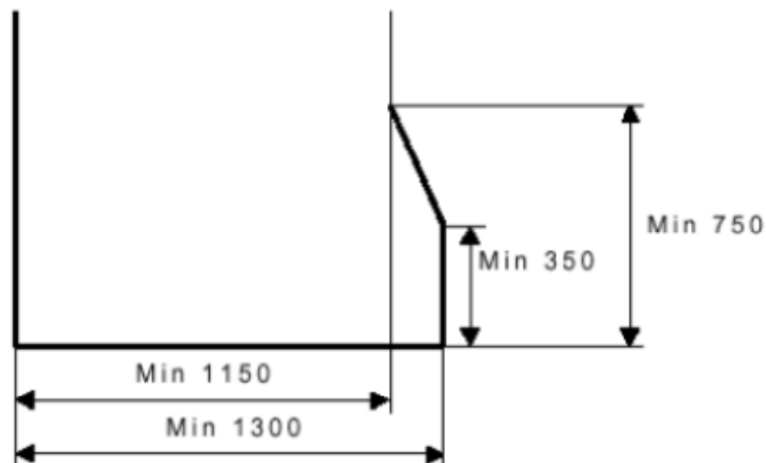
3.6. Wheelchair accommodation provisions

3.6.1. For each wheelchair user provided for in the passenger compartment, there shall be a special area at least 750 mm wide and 1300 mm long. The longitudinal plane of the special area shall be parallel to the longitudinal plane of the vehicle and the floor surface of the special area shall be slip resistant and the maximum slope in any direction shall not exceed 5 per cent.

In the case of a wheelchair space designed for a forward facing wheelchair, the top of preceding seat-backs may intrude into the wheelchair space if a clear space is provided as shown in Annex 4, Figure 22.

Figure 22

MINIMUM CLEAR SPACE FOR THE WHEELCHAIR USER AT THE WHEELCHAIR SPACE
(see annex 8, paragraph 3.6.1.)

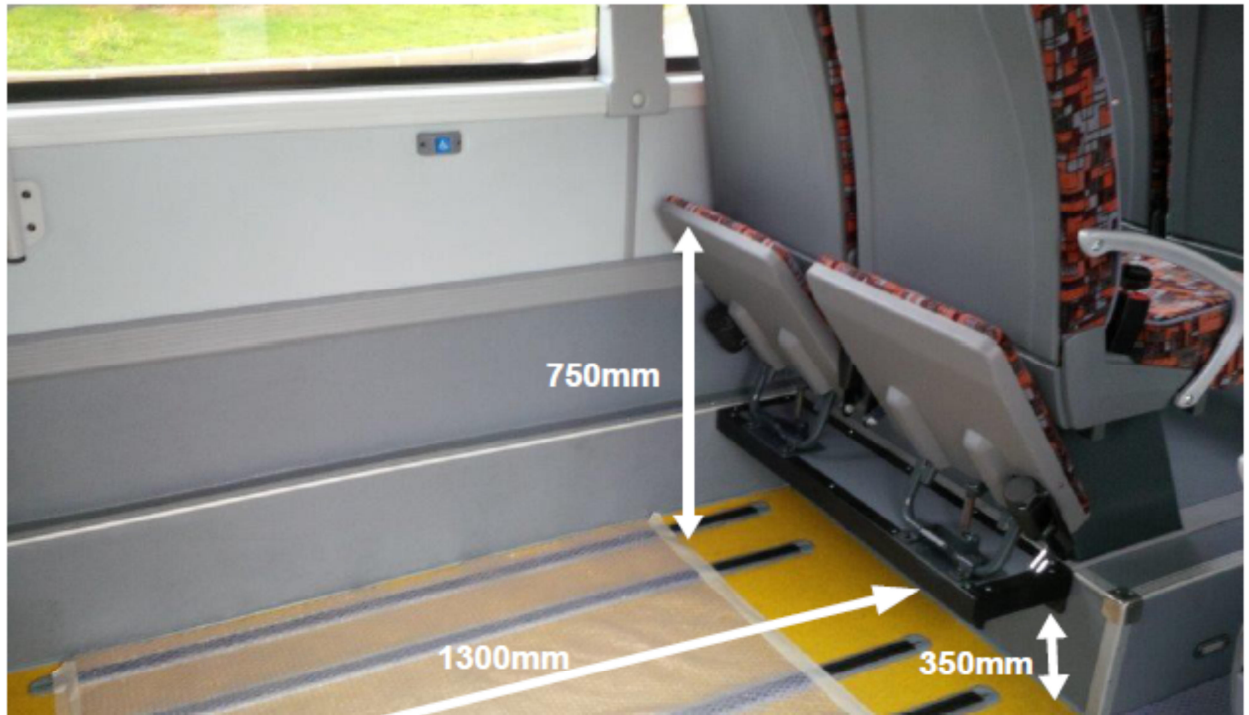


3.7.1 Folding seats may be fitted in a wheelchair space. However, such seats when folded and out of use shall not intrude into the wheelchair space.

QUESTION:

Do these folding seats comply with Regulation 107?





Option	Solution	Accept	Reject
A	Only the top of preceding seat-backs may intrude into the wheelchair space in accordance with Annex 4, figure 22 . It should not apply to folding seats. Therefore these folding seats do not comply with Regulation 107	X	
B	These folding seats comply with R107		X

The meeting decided that answer for this question is A: the top of preceding seat-backs may intrude into the wheelchair space in accordance with Annex 4, figure 22. It should not apply to folding seats. Therefore folding seats shown in a Picture above do not comply with Regulation 107.

10.6. UNECE Regulation No. 107

Measurement of Dimension « H », in Class I Vehicle (France 4)

LEGISLATION :

7.7.8.4. Seat spacing (see annex 4, figure 12)

7.7.8.4.1. In the case of seats facing in the same direction, the distance between the front of a seat squab and the back of the squab of the seat preceding it (**dimension H**), shall, when measured horizontally and at all heights above the floor between the level of the top surface of the seat cushion and a point 620 mm above the floor, not be less than:

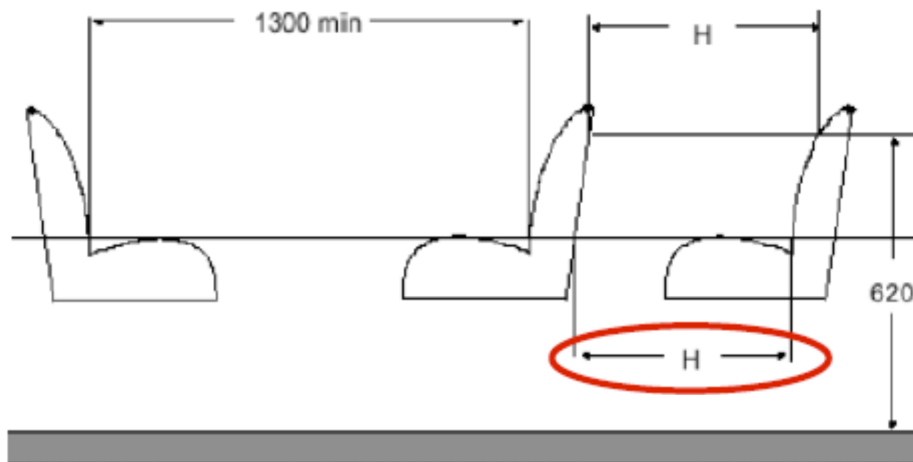
H	
Clas I, A and B	650 mm
Class II and III	680 mm

7.7.8.4.2. All measurements shall be taken, with the seat cushion and squab uncompressed, **in a vertical plane passing through the centreline of the individual seating place.**

Figure 12

SEAT SPACING

(see annex 3, paragraph 7.7.8.4.)



QUESTION:

Does this measurement of Dimension H comply with Regulation 107?



Option	Solution	Accept	Reject
A	NO. The back of the seat should not have a central recess (sunken area) to comply with dimension H requirement.	X	
B	This measurement complies with R107		X

Type approval authorities decided that answer for question is A: the back of the seat should not have a central recess (sunken area) to comply with dimension H requirement.

11. Miscellaneous:

11.1. Request for acceptance by the Netherlands of national small series granted by other Member States (Netherlands 4)

Directive or Regulation number:
-
Subject:
- Request for information on e4 type approvals; - Request for acceptance by the Netherlands of national small series granted by other Member States. - Standard email list for TAAM purposes

Reference to Annex, etc in the Directive or Regulation:
-

Text:
<p>Several times requests for <u>information on the content of approvals</u> granted by the Netherlands have been sent to the TAAM participant of the Netherlands. It is urgently requested to send such requests directly to the responsible division of RDW for providing that information. The email address of that division is: A&R@rdw.nl.</p> <p>With regard to the <u>acceptance of national small series approvals</u> by the Netherlands it is also requested to send such requests to ttv-pb@rdw.nl directly and not (any more) to the Dutch TAAM participants.</p> <p>For the position on the TAAM questions all questions are discussed in a special meeting at RDW level. That meeting is coordinated by Mr. René Vlietstra. For practical reasons it is desirable that he will receive all correspondence as well. Therefore we would like to ask all delegates to include his email address, (rvlietstra@rdw.nl) in the TAAM email list of addressees.</p>

Question:
-

Solutions Q1:	
A	Agreed

Type approval authorities agreed about this request and according to this, the list of ETEAS will be adjusted.

11.2. Information about failures of the rear underrun protection devices (Sweden)

TAA of SE asked if other TAA could send information about accidents containing failures of the rear underrun protection devices.

11.3. Geneva item 6.7 (Germany)

(6.7 Directive (EC) 2007/46 - (EC) 65/2012)

Gear Shift Indicator and fuel consumption savings verification (Spain)

DE asked to change answer of the TAAM in Geneva (2013) item 6.7 to A.
ES informed that the solution B was accepted last TAAM.

12. Next TAAM

CZ kindly proposed to organize next TAAM in their country. And it is possible that following TAAM will be held in Iceland.

Meeting minutes
Annex I

2nd TAAM RMI sub-group report

2nd RMI sub-group meeting held on: 03/04/2014

Location: VCA, Nuneaton.

List of attendees:

Ireland	
Germany	
Finland	
UK	
NL	
Estonia	
Slovakia	

Also in attendance was:

Ricardo-AEA (*Consultants contracted by Commission to carry out a review of the RMI system*).

Attachments to this report:

- Agenda to 2nd Sub-group meeting. (Annex 1)
- European Commission notice concerning "Study on the operation of the system of access to vehicle repair and maintenance information". (Annex 2)
- Ricardo AEA Type Approval Authorities Questionnaire. (Annex 3)

Meeting minutes
Annex I

Overview:

The RMI sub-group was created to address specific difficulties highlighted during TAAM concerning RMI.

These difficulties concern the access to vehicle manufacturers' websites for their Vehicle Repair and Maintenance Information.

The EC requirements for RMI are contained within the following EC Regulations:

- (EC) No. 715/2007
- (EC) No. 692/2008
- (EC) No. 566/2011

Meeting minutes

Annex I

CEN Standards:

EN ISO 18541 suite of standards:

These standards have yet to be published.

- EN ISO 18541-1, 2 and 3 were approved on 12th February 2014 and are expected to be published July 2014.
- prEN ISO 18541-4 is open for Enquiry until 28/04/2014, date of publication is unknown. This is probably of most significance to approval authorities.

When published how are approval authorities to consider these standards?

For instance:

- Will these standards be mandatory or voluntary?
- When these standards are published, will approval authorities need to verify RMI systems against these standards?
- Currently approval authorities shall grant type-approval after receiving from the manufacturer a Certificate on Access to Vehicle OBD and Vehicle repair and Maintenance Information".
 - Will this requirement remain?
 - Will this Certificate need to accommodate these standards?
 - Can approval authorities accept this Certificate without having to consider these standards?

These questions have been added to the conclusions reached at the 1st RMI sub-group meeting. (See Annex 1)

Germany and Netherlands have offered to review prEN ISO 18541-4 and to report back to the group on their findings.

The initial review of prEN ISO 18541-4 from NL indicates that this may not be useful for type approval authorities. (Most likely approval authorities may not have the expertise and experience required by prEN ISO 18541-4)

As a result of this review the following conclusion can be reached:

In order for approval authorities to be able to be satisfied that manufacturers are complying with ISO 18541, the Commission will need to either amend or create a new "Certificate on Access to Vehicle OBD and Repair and Maintenance Information". This certificate will need to include a declaration from the manufacturer with regard to the manufacturer's compliance with ISO 18541.

This conclusion can be a recommendation from TAAM.

Meeting minutes

Annex I

EC Multi-Stage Manufacturers:

This meeting highlighted the need to consider RMI with respect to multi-stage approvals.

Multi-stage manufacturers' websites will not be as advanced as M1 manufacturers RMI websites. This will lead to difficulties in applying the RMI requirements:

- How detailed should 2nd and subsequent stage manufacturers' RMI websites be?
- Must they include RMI for the entire completed vehicle?
- Is it enough for these manufacturers to cover within their RMI system only those parts/components related to their work and to:
 - Provide references to all RMI websites for the previous stage(s) manufacturer(s)
- Must these websites be in compliance with the CEN Standards (EN ISO 18541-1, 2, 3, 4)
- Can 2nd and subsequent stage manufacturers be expected to provide the "Certificate on Access to Vehicle OBD and Vehicle Repair and Maintenance Information" as it is currently worded?

Germany offered to prepare a text looking at RMI with regard to multi-stage approvals. When ready, this will be circulated to the group for additional input.

RMI review by Ricardo -AEA

See European Commission notice concerning "Study on the operation of the system of access to vehicle repair and maintenance information" (Annex 2).

Ricardo-AEA have been contracted by the Commission to:

- Assess the impact of RMI.
- How well it works.
- Wider impacts of RMI on:
 - Competition
 - Internal market
 - Safety and environment.

Ms Fiona Twisse gave a presentation on what this review will entail.

- To help them do this they have developed a questionnaire (see Annex 3) for circulation to the approval authorities.
- Have expressed a wish to use the RMI sub-group as a pilot group.
- Will be organising interviews with the approval authorities.
- It was suggested at the RMI group to do a group interview rather than individual interviews:
 - An invitation to attend the next TAAM to conduct a group interview and to present initial findings was extended to Ricardo AEA.
 - Ricardo AEA welcomed this invitation but felt that due to time constraints they are working too, the next TAAM would be too late.
- Ricardo AEA assured everyone of confidentiality.

Meeting minutes
Annex I

Conclusions:

- The conclusions and recommendations from the 1st RMI sub-group meeting remain unchanged.
- The questions raised during the discussion concerning the CEN standards (EN ISO 18541 suite of standards) have been added to the OBD+RMI Summary Rev 01 document. (Attached)
 - The initial review of prEN ISO 18541-4 and possible conclusion have been added to the OBD+RMI Summary Rev 01 document.
- The questions raised during the discussion concerning the level of RMI required for EC Multi-Stage Manufacturers have been added to the OBD+RMI Summary Rev 01 document. (Attached)

Next RMI sub-group meeting:

Will be scheduled to coincide with the 3rd COP sub-group meeting. This will take place before the Prague TAAM.

Meeting minutes
Annex I

Annex 1

Agenda to 2nd Sub-group meeting

2nd TAAM RMI sub-group meeting

Date: 03/04/2014

Location: VCA, Nuneaton.

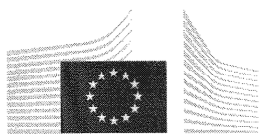
Agenda:

1. Brief summary of RMI.
2. Review of legislation.
3. Review of CEN Standards being prepared for RMI.
4. RMI review by Ricardo-AEA on behalf of the Commission.
5. Conclusions.
6. Date of next meeting.
7. Close of meeting.

Meeting minutes

Annex I

Annex 2



EUROPEAN COMMISSION
ENTERPRISE AND INDUSTRY DIRECTORATE-GENERAL

Sustainable Growth and EU 2020
Sustainable Mobility and Automotive Industry

Brussels, 14 January 2014
PJ/as

To whom it may concern,

Subject: Study on the operation of the system of access to vehicle repair and maintenance information


The European Commission (Directorate General for Enterprise and Industry) has recently launched a project aiming to undertake a review on the operation of the system of access to vehicle repair and maintenance information.

EU legislation on the type approval of cars and vans (Regulation no. 715/2007) includes a specific chapter on access to vehicle repair and maintenance information, which aims to ensure full and non-discriminatory access to vehicle on-board diagnostic and repair and maintenance information.

After a tender process, the European Commission contracted Ricardo-AEA (UK) to conduct the study. The aims of the study are to evaluate:

- The operation of the system of access to vehicle repair and maintenance information; and
- Wider impacts of the system of access to vehicle repair and maintenance information on:
 - Competition;
 - The internal market; and
 - Safety and environment.

The project was launched at the beginning of January 2014 and will be completed by end of June 2014. In order to complete this work, the study team will carry out an intensive programme of surveys, interviews and field studies. It would be greatly appreciated if you and/or your organisation could contribute by supporting the collection and compilation of relevant information. Should you require further details or more background on this project, please do not hesitate to contact Mr Luis Escobar (luis.escobar-guerrero@ec.europa.eu; +32/2/299 82 96), who is the responsible desk officer at DG Enterprise and Industry.


Philippe Jean
Head of Unit

Meeting minutes
Annex I

Annex 3



Type approval
authorities REVISED c

Survey for Type Approval Authorities

1 Objectives of the study

The European Commission (Directorate General for Enterprise and Industry) has recently launched a project to review the functioning of the system of access to vehicle repair and maintenance information (RMI) for Euro 5/6 vehicles. Ricardo-AEA is carrying out the study on behalf of the Commission.

EU legislation requires that Vehicle Manufacturers (VMs) provide full access to vehicle on-board diagnostic and RMI to independent operators. Euro 5 requirements apply to any new model being type approved from 1st September 2009 and for all vehicles being sold from 1st January 2011.

The aims of this confidential survey are to evaluate:

- How well the system of access to vehicle RMI is operating; and
- Impacts of the system on competition, particularly given the ability for all repairers to access and use relevant technical information on vehicles.

Your responses will be used to help us recommend ways to improve the system. It is therefore important that you complete this questionnaire as fully as possible.

Any information that you provide will be treated confidentially.

2 Background information

Please provide some background on your organisation. *This information will be used for verification purposes only and will be kept confidential*

Organisation name	<i>Click here to enter text.</i>
Country	<i>Click here to enter text.</i>
Please give brief details about the function of your organisation – e.g. national remit	<i>Click here to enter text.</i>

2.1 **Have you conducted type approvals for any of the following vehicle makes/brands for Euro 5/6 vehicles? Please select all that apply.**

Please select all relevant vehicle makes/brands; even if you are aware that the vehicle manufacturer has received type approval from more than one authority. If you issue type approval for any manufacturers not included in this list, please provide details in the 'Others' section.

	Yes
Aston Martin	<input type="checkbox"/>
BMW (including Mini and Rolls Royce)	<input type="checkbox"/>
Daihatsu	<input type="checkbox"/>
Daimler (including Mercedes-Benz, Smart, Maybach)	<input type="checkbox"/>
Fiat (including Alfa Romeo, Abarth, Lancia, Maserati, Chrysler, Dodge, Jeep, Ferrari,)	<input type="checkbox"/>
Ford	<input type="checkbox"/>
GM (Opel, Vauxhall, Chevrolet, Cadillac)	<input type="checkbox"/>
Iveco	<input type="checkbox"/>
Jaguar Land Rover	<input type="checkbox"/>
Honda	<input type="checkbox"/>
Hyundai	<input type="checkbox"/>
Kia	<input type="checkbox"/>
Lotus	<input type="checkbox"/>

	Yes
Mahindra	<input type="checkbox"/>
Maserati	<input type="checkbox"/>
Mazda	<input type="checkbox"/>
MG	<input type="checkbox"/>
Mitsubishi	<input type="checkbox"/>
Nissan (including Infiniti)	<input type="checkbox"/>
Porsche	<input type="checkbox"/>
PSA Peugeot Citroen	<input type="checkbox"/>
Renault (including Dacia)	<input type="checkbox"/>
Santana	<input type="checkbox"/>
Shijiazhuang Shuanghuan	<input type="checkbox"/>
Ssangyong	<input type="checkbox"/>
Subaru	<input type="checkbox"/>
Suzuki	<input type="checkbox"/>
Toyota (including Lexus)	<input type="checkbox"/>
Volkswagen (Audi, SEAT, Skoda, Bugatti, Lamborghini)	<input type="checkbox"/>
Volvo	<input type="checkbox"/>
Others (please specify)	<input type="checkbox"/>
<i>Click here to enter text.</i>	<input type="checkbox"/>

3 Routine verification of compliance

The legislation requires that OEMs provide a Certificate on Access to Vehicle OBD and Vehicle Repair and Maintenance information. This must include:

- The address of the principal website for access to vehicle repair and maintenance information:
- Date from which it is available (no later than 6 months from the date of type approval)
- Terms and conditions of access to website:
- Format of the vehicle repair and maintenance information accessible through website:

Note that it is not mandatory for TAAs to check the compliance of manufacturers during the application for type approval. The approval authority may presume that the manufacturer has put in place satisfactory arrangements and procedures with regard to access to vehicle OBD and vehicle repair and maintenance information, on the basis of a completed Certificate on Access to Vehicle OBD and Vehicle Repair and Maintenance Information, providing that no complaint was made

3.1 How frequently do you verify that manufacturers provide the minimum technical information required under Regulation 715/2007?

	N/A	Never	Rarely (i.e.<20% of the time)	Sometimes (20-40% of the time)	Often (40-60% of the time)	Most of the time (80-99% of the time)	All of the time
During the regular conformity assessment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
After 6 months of TA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	N/A	Never	Rarely (i.e.<20% of the time)	Sometimes (20-40% of the time)	Often (40-60% of the time)	Most of the time (80-99% of the time)	All of the time
After a complaint has been made assessment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Please explain any procedures you have taken (or put in place) to verify that the information has been made available (or procedures that you would anticipate taking if you have no experience of verification) for each of these elements							
During the regular conformity assessment	<i>Click here to enter text.</i>						
After 6 months of TA	<i>Click here to enter text.</i>						
After a complaint has been made assessment	<i>Click here to enter text.</i>						

3.2 Please explain how you established those procedures?

Click here to enter text.

3.3 Approximately how long does it typically take to carry out these actions for each new type approval (e.g. hours)? Please provide further information on how this may vary depending on the situation, where applicable.

Click here to enter text.

4 Spot checks of compliance

4.1 How frequently do you carry out spot checks to verify that manufacturers provide the minimum information?

	N/A	Never	Rarely (i.e.<20% of the time)	Sometimes (20-40% of the time)	Often (40-60% of the time)	Most of the time (80-99% of the time)	All of the time (100% of the time)
Spot checks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Please explain your answer, including what criteria you use to select cases to spot check (e.g. by manufacturer, random selection etc.)							
<i>Click here to enter text.</i>							

4.2 Have any vehicle manufacturers taken steps to actively prove to your organisation that they are complying with the requirements to provide access to vehicle RMI, e.g. by demonstrating their websites to you?

Yes	No	If YES, please explain what steps the vehicle manufacturers took?
<input type="checkbox"/>	<input type="checkbox"/>	<i>Click here to enter text.</i>

4.3 Was this proof provided after a complaint was made – or with some alternative purpose?

After a complaint	Other purpose	Please explain – for example, if the actions were proactive?
<input type="checkbox"/>	<input type="checkbox"/>	<i>Click here to enter text.</i>

5 Functioning of the Regulation

5.1 Have you received any specific complaints from independent repairers/operators regarding access to technical information under Regulation 715/2007?

Yes	No	If YES, please elaborate on your answer, including the specific manufacturers and information involved, and the actions taken
<input type="checkbox"/>	<input type="checkbox"/>	<i>Click here to enter text.</i>

5.2 Are you aware of any instances where the required technical information has not been supplied, but no complaints have been made?

Yes	No	If YES, what barriers do you think there are with respect to making complaints?
<input type="checkbox"/>	<input type="checkbox"/>	<i>Click here to enter text.</i>

5.3 How easy or difficult has it been for you implement measure to ensure compliance with the requirements of Regulation 715/2007 with respect to access to repair and maintenance information?

N/A	<input type="checkbox"/>
Very straightforward – no major problems	<input type="checkbox"/>
Straightforward, but we experienced some minor problems	<input type="checkbox"/>
Relatively straightforward – few problems	<input type="checkbox"/>
Difficult – we experienced a number of problems	<input type="checkbox"/>
Very difficult – we experienced many major problems and are still having problems	<input type="checkbox"/>
Additional comments:	

5.4 Have you ever withheld or revoked type approval, in the event access to technical information was not granted?

Yes	No	Please explain – for example, which manufacturers were involved and how was the process resolved?
<input type="checkbox"/>	<input type="checkbox"/>	<i>Click here to enter text.</i>

5.5 Please elaborate on any other possible measures to ensure compliance with the regulations that you feel are available to you in the event that manufacturers do not comply with the requirements for access to RMI. Please estimate the cost of these enforcement actions if possible.

Click here to enter text.

5.6 What guidance or best practice would be needed to assist you in dealing with your obligations under the Regulation?

Click here to enter text.

5.7 Please explain the top three issues that cause you the most difficulty with respect to facilitating compliance with the regulations the Regulation

1	<i>Click here to enter text.</i>
2	<i>Click here to enter text.</i>
3	<i>Click here to enter text.</i>

5.8 What measures would make it easier for you to ensure that the Regulations have been met? Please suggest up to three and provide details, where appropriate.

1	<i>Click here to enter text.</i>
2	<i>Click here to enter text.</i>
3	<i>Click here to enter text.</i>

5.9 In your opinion, are there any other issues that are not currently addressed by the Regulation with respect to RMI aspects, but should be considered? Please suggest up to three

1	<i>Click here to enter text.</i>
2	<i>Click here to enter text.</i>
3	<i>Click here to enter text.</i>

6 Closing remarks

6.1 Do you have suggestions or any other comments on any aspect of the survey?

Click here to enter text.

6.2 May we contact you for further inputs to this study? If yes, please provide your contact details below

Contact name	<i>Click here to enter text.</i>
Email address	<i>Click here to enter text.</i>
Telephone number	<i>Click here to enter text.</i>
Confidentiality arrangement	<p><i>Thank you for your time, today. All of your responses will be used only for the purpose of this study.</i></p> <p><i>Could you confirm whether you are happy for your company to be named and your responses to be quoted in our study - or would you prefer for your company name to remain confidential when responses are quoted within the report?</i></p> <p>Agrees to named quotes: <input type="checkbox"/></p> <p>Does not agree to be identified: <input type="checkbox"/></p> <p>Other (e.g. request not to be quoted, at all): <input type="checkbox"/></p> <p>Details: <i>Click here to enter text.</i></p>

--- End of survey --- Thank you for your time ---