
Minutes of the Type-Approval Authorities Meeting

4 and 5 June 2002 in Tuusula, Finland

0 OPENING OF THE MEETING

1 APPROVAL OF THE MINUTES OF THE PREVIOUS MEETING IN BRUSSELS

The corrections of point 2.24, Mechanical coupling devices, and point 2.25, Definition of the term “separate control”, were made in the minutes of the previous meeting: The remarks of the issue 2.24 were made by Finland, not by Germany. The issue 2.25 was introduced by Finland, not by France.

The minutes of the previous meeting was approved with the above mentioned remarks.

2 ITEMS IN RELATION TO FRAMEWORK DIRECTIVE 70/156/EEC AND ITS SEPARATE DIRECTIVES

2.1 Directive 70/156/EEC: Transitional regulations of amending Directive 2001/116/EC (Germany 2)

Solution B was accepted although the audience pointed out the fact that not every Member State is present. The wording of Germany’s proposal B was:

It is deemed that the real date of validity of the amending Directive 2001/116/EC is the 1st of July 2002. From this date on all informations in new EC-type approvals have to be in line with this new situation. Type approvals that have been granted up to the 30th of June 2002 will be accepted by all member states whether they have been based on the amending Directive 2001/116/EC or 98/14/EC.

2.2 Directive 70/156/EEC: Document of origin according to Annex XV in connection with multistage-type approvals (Germany 1)

Solution A was accepted. The audience pointed out that solution B would not be in line with the Directive. The wording of Germany’s proposal A was:

The manufacturer of a basic or incomplete vehicle of other categories than M₁ fills in the document of origin according to annex XV or Directive 70/156/EEC for each single vehicle.

2.3 Directive 70/156/EEC: Multi-stage EC type-approval (France 5)

The suggestion of France was approved. The suggestion was to fill in more information than needed for an approval of an incomplete vehicle according to the separate Directives. This could be done in cases where the information is available.

- 2.4 Directive 70/156/EEC: Do motor vehicles within the scope of Directive 70/156/EEC need to have doors? This question came up in relation with the marketing of the 'Smart Crossblade'. (European Commission)

The opinion of this audience was, that no doors are needed. If there are no doors, there is no need for door latches and hinges.

- 2.5 Implementation stage of some Directives (Directive 77/541/EEC*2000/3/EC) (Belgium 4)

The implementation stage of the approval similar to emissions was considered to be too complicated. The usage of index A and B would increase the possibility of confusion. Article 5 authorises to obtain more information from the approval authority if this is needed. Information can be provided in the remarks of the type approval certificate.

- 2.6 Document and marking of vehicles should match regarding reference to actual approval (Sweden 2)

This question was discussed rather briefly. The idea of adding the extension number back to the manufacturers plate was considered to be too difficult. Should the information on the manufacturers plate, the COC-document or the approval document deviate from one another, the problem should be solved with the technical service. It was reminded that approvals are valid as long as the single Directives are valid, also after new extensions are introduced.

- 2.7 Directive 76/756/EEC: Number of lighting equipment (additional retro reflectors) (Germany 3)

It was decided, that this matter should be discussed in other forums like GRE.

- 2.8 Directive 92/21/EEC: Trailerload and number of seating positions (Germany 4)

It was pointed out that the Directives work properly only if every member state acts in the same way. If changes are desired, the correct authorities should be contacted. Since the European Commission has pointed out that when fixing the acceptable trailerload of a vehicle the prescription of number 3.4 of annex II of Directive 92/21/EEC has to be fulfilled, it was wondered why these matter had to be discussed in this forum. The majority of the participants supported Germany's proposal A which was formulated as follows:

All type approval authorities act in line with the decision of the European Commission.

- 2.9 Directive 94/20/EEC: Drawbar as a part of the chassis of the towed vehicle (Finland 1)

This matter caused a wide span of opinions. The participants of this meeting agreed that the chassis should not be handled as a drawbar which should be tested if all three of following requirement is fulfilled:

- The same bar which carries load continues to the drawbar and is not welded or joined together from two parts.
- The part of the bar which carries load is in the same line with the "drawbar"-part
- The material and its thickness is the same for the whole bar.

Several participants would also have approved solutions in which not every of the above mentioned requirements would have been fulfilled.

- 2.10 Directive 74/483/EEC: Application of the prescriptions of Directive 74/483/EEC – external parts – for vehicle connection devices according to Directive 94/20/EC (Germany 9)

After a brief discussion it was obvious that there is confusion over the scope of Directive 74/483/EEC. It was decided, that Germany will raise a question to the Commission whether the external parts of the coupling device of a category M₁ vehicle should be exempted from the scope of Directive 74/483/EEC or not (The coupling ball itself is exempted).

2.11 Directive 95/28/EEC: Affixing of markings to vehicle parts (Germany 6)

According to the Commission there has been enacted the agreement concerning the Directive 95/28/EC and the marking of materials in the official minutes of the 59th meeting of the Motor Vehicles Committee held in Brussels on 1st and 16th July 1999 (Doc III/5487/99-EN) stating

“The approval mark would be indelibly affixed onto rolls of fabrics, rolls of carpet, whole panels etc., delivered by the supplier. The vehicle manufacturer has to demonstrate to the inspection service responsible for the approval that all the materials used inside the vehicle were taken from approved batches.”

The Netherlands told that the marking of materials has been discussions also at GRSG. The following has been stated in the document TRANS/WP.29/GRSG/1999/23/Rev.1:

“4.4 There shall be affixed, conspicuously and in a readily accessible location specified on the approval form, to every vehicle conforming to a type approved under this Regulation, to the packaging of every material (see paragraph 4.4.2.3.) conforming to a type approved under this Regulation and to every component supplied separately conforming to a type approved under this Regulation, an international approval mark consisting of:

...

4.4.2.3. Production materials do not need to be individually marked. However, the packaging with which they are supplied must be clearly marked with the approval mark described above.”

It was agreed that the above mentioned conclusions are valid.

2.12 Directive 98/69/EC*2001/100/EC: Diesel OBD – Catalyst monitoring (Belgium 1)

The questions Belgium 1 and Belgium 2 were raised because the OBD-working group on February 2002 wanted to have the opinion of TAAM. Belgium’s suggestion of replacing the catalyst with a dummy was accepted. The wording of the suggestion was:

According to item 3.3.5 of Annex XI of 98/69/EC and also according to the draft proposal on Directive 88/77/EEC, in order to get acceptance for an approval without catalyst monitoring the manufacturer needs to demonstrate by removal or total failure of the catalyst that the emissions do not exceed the limits given in item 3.3.2 during a Type-I test. This can be done by using a dummy catalyst or by removal of the whole catalyst and following the test procedure laid down in item 6.

2.13 Directive 98/69/EC*2001/100/EC: OBD – Electrical disconnection (Belgium 2)

All three proposals were found to be appropriate. TAAM decided to keep an eye on the matter and possibly raise the question on next meeting. The wording of the suggestion was:

There are 3 possible ways to demonstrate it according to the adopted strategy :

- the MIL comes on “immediately” after starting the engine and performing a electrical disconnection. So, it is not needed to drive a full Type I cycle ;
- the MIL comes on during the first, second or third (at least) pre-conditioning cycles according to the adopted strategy. The pre-conditioning cycles must be carried out ;
- the MIL does not come on according to the strategy adopted by the manufacturer. The manufacturer has to demonstrate that the emission values measured according to the procedure laid down in item 6 are below the threshold limits given in item 3.3.2.

Anyway, the corresponding fault code shall be checked and verified.

2.14 Directive 98/69/EC: In use compliance testing of exhaust emissions (Germany 11 + Annex)

It was recognised that the letter about the intended measurements could be understood incorrectly. The intent of VCA is to see which manufacturers have a relatively poor audit procedure and thereby target such manufacturers in their in-use conformity checking test programme. This seems to be in line with the intent of the Directive. However, VCA can only take action against non-conforming vehicles according to the rules laid down in Directive 98/69/EC and only with those manufacturers for which VCA is the type-approval authority for that particular vehicle type. If a fault is found with a vehicle type not type-approved by VCA, information must be given to the type-approval authority in whichever Member State. VCA promised to send out a new letter to the manufacturers to clarify the matter.

2.15 R-point definitions (Belgium 3)

It was agreed that R-point definitions are different from one another in some cases, and that Belgium will demonstrate a compilation of definitions with proposals for changes. The issue shall be taken up in the next TAA –meeting.

6 NEXT MEETING

Belgium will arrange the next meeting in December 2002 before Christmas. The German participants suggested, that the meeting of Summer 2003 could be held in Germany in May or June 2003. Belgium agreed on the proposal that also the Candidate Countries and Turkey will be invited to participate the TAA-Meeting. On the first time these new TAAM-Participant Countries could participate as observers and the number of their representatives should be limited to one per Country. Commission will provide Belgium with a list of representatives of the possible new TAAM-Participant Countries. In addition, Turkey will in the future be included in the exchange of information about type-approvals.

5 GENERAL ITEMS

5.1 Difficulties associated with corrections in the WVTA system (Iceland 1)

It was discussed how the errors and misprints in the Type Approval certificates should be handled. The discussion was raised because some approval corrections have been considered as confusing. The Type Approval Authorities are encouraged to point out the errors and misprints more clearly and properly.

5.2 The results of the inquiry about the notification requirements of the technical services (item 5.4 of the Brussels meeting) (Finland 3)

The updated results of the inquiry will be sent with the minutes of the meeting.

5.3 Component approvals in electronic form (Finland 2)

The participants agreed, that it is no longer necessary to send the monthly lists of component approvals to each Member State in paper form. Further on, the participants were keen to develop the emailing or web-based information on approvals granted. The Commission pointed out that if requirements or Articles of certain Directives, in particular the framework Directives, need to be changed on this subject it should be brought up in the MVWG.

5.4 Information system of the type-approving authorities (Germany 8)

Germany suggested that an information system as prescribed in the document Germany 8 , Guideline, Information System of the type approval authorities could be applied. Germany proposed that the System could be started by using email and would be later transferred gradually to one server. This Information System is going to be tested and the experiences shall be discussed in the next meeting.

3 ITEMS IN RELATION TO FRAMEWORK DIRECTIVE 92/61/EEC AND ITS SEPARATE DIRECTIVES

3.1 Directive 97/24/EC: Interpretation of certain provisions of Directive 97/24/EC, Chapter 7, relating to anti-tampering measures for two-wheel mopeds and motorcycles (item 3.1 of the Brussels meeting) (Denmark 1)

1. European Commission: Wording of the Directive is if not at fault, but at least confusing. Motorcycle Working Group is preparing to make amendment on this. On the issue of considering shear bolts as a proper way of hindering the exchanging of exhaust system on a moped, the majority of participants saw the use of shear bolts acceptable. The representative of the European Commission announced that the Commission is in the process of examining the relevance and effectiveness of the Directive presently regulating the design, performance, construction and fitting of anti-tampering measures. In this context the Commission will carry out a detailed study in order to ascertain whether or not the measures in force can be considered appropriate, inadequate or too extreme. The study shall still be launched this year.
2. Common understanding of all participants was that both interpretations, a) and b) are correct.
3. The concept of an artificial restriction was deemed to be too indefinite, and would therefore be a matter for the Approval Authority to decide. The Chairman raised Tour de Table on whether the given example of a welded restrictive ring after the rear silencer should be considered as an artificial restriction or not:

Denmark, Finland, Iceland, Norway and Sweden would consider this as an artificial restriction,

whereas France, Germany, Luxembourg, Netherlands and Spain would not.

Belgium and United Kingdom would need some time for consideration to make a stand.

4. Common understanding was that the reference numbering of anti-tampering components on the anti-tampering control plate should follow the numbering of the Directive. As to the identification of pulleys, the diameter of the pulley was deemed somewhat difficult to define on grounds of many different designs. Most participants agreed on identification of pulleys by manufacturer's markings.

3.4 Directive 92/61/EEC: Noise when in motion on the CoC (The Netherlands 2)

It was agreed that the Noise when in motion -value on the CoC shall be the actually measured value, not the maximum permissible value.

3.5 Directive 92/61/EEC: Twin wheels (Directive 92/61/EEC Article 2) (Sweden 1)

Participants except Sweden agreed, that a twinned wheel does not actually have to have a rigid connection between the two wheels, and should be counted as one wheel according to the distance between the two wheels, not depending on the type of suspension.

Sweden on its behalf stated it has no problem in changing its point of view, but had brought this issue up in order to check its own national, history-based opinion on these kind of structures against other countries views.

3.6 References to information document are in some type-approvals not specified as unique (Sweden 3)

Most of the participants agreed that the Information documents should be identified to the correct approval and extension. It was also brought to notice, that the Directive 2002/24/EC is the first Directive which demands this.

2.16 Directive 2001/85/EC: Lift platform dimensions (The Netherlands 1)

It was agreed, that the railing should be excluded and the free space should be measured.

2.17 Directive 95/54/EEC:

a) Interpretation regarding EMC (Sweden 5)

The Commission told that the Directive 95/54/EC is soon going to be modified. The scope of the Directive has also been discussed at the Commission: the Commission has made a flow-chart (annexed to these minutes) with which it is easier to determine whether the product falls under the scope of the Directive or not.

Sweden pointed out that sometimes it is not very obvious if the product has been made both for use in motor vehicles and in boats or machinery. The United Kingdom and Germany encouraged the approach that in those cases both CE-marking and e-marking (EC-type approval) are required.

To get a more common understanding of the present scope and coverage of the Directive 95/54/EC it was agreed that Germany will provide Finland with a demonstrational list of equipment belonging to the scope of the Directive. The list will be annexed to the minutes of this meeting.

b) With Directive 95/54/EC coming fully into force on 1 October 2002 the question has been arisen in some Member States what to do with electrical equipment covered by this Directive already installed on vehicles in use. Can electrical equipment covered by Directive 95/54/EC but not being type-approved according to this Directive be used onwards on/in the vehicle where it is already installed, respectively may this equipment be transferred to other vehicles? (European Commission)

Present Member States (Iceland, Norway and Spain expressed no opinion) had the opinion that electrical equipment covered by Directive 95/54/EC but not being type-approved according to this Directive can be used onwards on/in the vehicle where it is already installed.

Finland, France, Germany and the Netherlands had the opinion that this equipment can not be transferred to other vehicles. Belgium, Denmark and the United Kingdom had the opinion that the Directive applies to new vehicles and thus this equipment is transferable within older vehicles.

2.18 Directive 92/23/EEC: Noise emissions of tyres (Germany 5)

Understanding of this forum was that the noise emission part of the Directive is required. It should be considered that the ECE-approval without the noise emission approval is not equivalent to the Directive and thus not acceptable.

2.19 Measures when deviations are discovered in conformity control for retreaded tyres (ECE R108 and R109) (Sweden 4)

According to the most participants the deviations found in COP Control can be divided in two groups:

- Small deviations, which may lead to new testing or pulling specific tyres off the market.
- Major deviations, which are considered safety issues, the whole approval can be cancelled.

In both cases should problems occur with a specific tyre size, that specific size can be excluded from the approval.

4 ITEMS IN RELATION TO FRAMEWORK DIRECTIVE 74/150/EEC AND ITS SEPARATE DIRECTIVES

4.1 Directive 74/150/EEC: Type approval of quads as agricultural tractors (Germany 7)

The issue was handled rather briefly because in many countries the approval authorities for the Directive 74/150/EEC are different from those for the Directive 70/156/EEC and hence those participating TAAM. Attention was drawn to the fact that the type approval can not foresee the use of these vehicles after the approval, though some obligatory equipment and capabilities are set out in the framework.

The framework Directive 74/150/EEC is under changing and the new revision is expected soon.

4.2 Directive 89/173/EEC: Coupling devices – clamping devices (hold-down devices) (Germany 10)

This issue was withdrawn by Germany.

2.20 Directive 76/115/EEC and ECE R14/05: Anchorages for Safety-belts: Interpretation of particular test specifications (determining of supplementing loads) (Finland 4)

Understanding of this forum was that the load intended to be applied is twenty times the weight of the seat only for the whole seat.

2.22 Directive 71/320/EEC*98/12/EC and ECE R13.09: Warning red signal for EBS trailer (item 2.28 of the Brussels meeting) (France 1)

No comments.

2.23 Directive 71/320/EEC*98/12/EC and ECE R13.09: Red warning signal (item 2.27 of the Brussels meeting) (France 2)

No comments.

3.2 Directives 92/61/EEC and 97/24/EC: Vehicle with bodywork or without bodywork – especially quadricycles (Spain 1)

This item was postponed (till next TAA-meeting) for lack of time.

3.3 Directive 97/24/EC: Approval of coupling devices according to Directive 97/24/EC Chapter 10 or Directive 94/20/EC (Spain 2)

This item was postponed (till next TAA-meeting) for lack of time.

2.21 Directive 96/79/EC and 77/541/EEC*2000/3/EC and 70/156/EEC*2001/116/EC: Description of supplementary restraint systems (France 4)

This item was postponed (till next TAA-meeting) for lack of time.

2.24 Directive 71/320/EEC*98/12/EC: Value of g (France 3)

This item was postponed (till next TAA-meeting) for lack of time.

3.7 92/61/EC: Assembly of the vehicle. Control of conformity. (Spain 3)

This item was postponed (till next TAA-meeting) for lack of time.

3.9 97/24/EC, Chapter 3: Interpretation of point 6.4 (a filler cap of the fuel tank) (Spain 4)

This item was postponed (till next TAA-meeting) for lack of time.

3.8 92/61/EC: Masses and dimensions (item 1.6 mass in running order) (France)

This item was postponed (till next TAA-meeting) for lack of time.

2.25 ECE R27 - Advance Warning Triangle (Luxembourg 1)

This item was postponed (till next TAA-meeting) for lack of time.

ANNEXES

1. The agenda of the meeting
2. The list of delegates attending TAAM-Tuusula 4 and 5 June, 2002
3. The results of the inquiry about the notification requirements of the technical services (item 5.2 of the meeting).
4. The flow-chart for determining whether the product belongs under the scope of the Directive 72/245/EEC*95/54/EC or not (item 2.17 of the meeting).
5. (a and b) The demonstrational lists of equipment belonging to the scope of the Directive 95/54/EC (item 2.17 of the meeting).