TYPE APPROVAL AUTHORITIES MEETING

9 and 10 MARCH 2005 – MADRID, SPAIN

MEETING MINUTES

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Authors:

Approved:

TYPE APPROVAL AUTHORITIES MEETING

9 AND 10 MARCH 2005 – MADRID, SPAIN

Attendees:

Austria

Belgium

Estonia

European Commission

Finland

France

Germany

Hungary

Iceland

Ireland

Luxembourg

Netherlands

Norway

Poland

Slovenia

Spain

Sweden

Switzerland

Turkey

United Kingdom

Not Represented: Bulgaria, Cyprus, Czech Republic**,** Denmark, Italy, Lithuania, Latvia, Malta, Portugal, Romania, Slovakia.

AGENDA

1. **Opening of the meeting**

2. **Adoption of the Agenda**

3. **Adoption of the minutes from Paris Sep 2004**

4. **Follow up on actions from the Paris meeting**

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   4.2 Review of member state's legal positions regarding "Rollover Stability. ECE Regulation 111" – Poland 4 (Paris 6.19): Page 7
   4.3 General items

5. **Items relating to framework directive 70/156 EC (motor vehicles)**

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MEETING MINUTES

1. Opening of the meeting.

The meeting delegates were welcomed by Ricardo Chicharro, chairman of the meeting.

2. Adoption of the Agenda

The agenda was accepted as presented and the following additional items were later added to Section 8 during the course of the meeting:

8.2 ETAES report from last meeting of the group.

3. Adoption of the minutes from Paris Sept 2004

The minutes of the Paris meeting were adopted without amendment.

4. Follow up on actions from the Paris meeting

4.1 Review of member state's legal positions regarding "Definition of service doors (bus and coach directive : 2001/85)" – UK 3 (Paris 6.11)

Question:

2003/76/EC (EMISSIONS): TRADE MARK FOR ORIGINAL REPLACEMENT CATALYSTS

BACKGROUND

Vehicle manufacturers are increasingly co-operating with power train sharing agreements that can result in a vehicle from one manufacturer having engine components that show the brand or trade mark of a different manufacturer (i.e. the one that built and supplied the engine).

2003/76/EC allows original replacement catalysts to be exempt from the requirements of Annex XIII (replacement catalyst testing and approval marking) provided that they are marked with the name or trademark of the vehicle manufacturer and the make and part number of the catalyst.

LEGISLATION: 70/220/EEC as amended by 2003/76/EC

Annex I

2.19. *"Original Replacement Catalytic Converter"*
means a catalytic converter or an assembly of catalytic converters whose types are indicated in point 1.10 of the Appendix to Annex X to this Directive but are offered on the market as separate technical units by the holder of the vehicle type-approval
[Annex X is the vehicle approval Certificate]

5.3.8. *Replacement catalytic converters and original replacement catalytic converters*

5.3.8.1. *Replacement catalytic converters intended to be fitted to EC type-approved vehicles must be tested in accordance with Annex XIII.*

5.3.8.2. *Original replacement catalytic converters, which are of a type covered by point 1.10 of the Appendix to Annex X and are intended for fitment to a vehicle to which the relevant type-approval document refers, do not need to comply with Annex XIII to this Directive provided they fulfil the requirements of sections 5.3.8.2.1 and 5.3.8.2.2.*

5.3.8.2.1. Marking

Original replacement catalytic converters shall bear at least the following identifications:

5.3.8.2.1.1. the vehicle manufacturer's name or trade mark;

5.3.8.2.1.2. the make and identifying part number of the original replacement catalytic converter as recorded in the information mentioned in point 5.3.8.3.

5.3.8.2.2. Documentation

Original replacement catalytic converters shall be accompanied by the following information:

5.3.8.2.2.1. the vehicle manufacturer's name or trade mark;

5.3.8.2.2.2. make and identifying part number of the original replacement catalytic converter as recorded in the information mentioned in point 5.3.8.3;

5.3.8.2.2.3. the vehicles for which the original replacement catalytic converter is of a type covered by point 1.10 of the Appendix to Annex X, including, where applicable, a marking to identify if the original replacement catalytic converter is suitable for fitting to a vehicle that is equipped with an on-board diagnostic (OBD) system;

5.3.8.2.2.4. installation instructions, where necessary;

5.3.8.2.2.5. this information shall be provided either:

- *as a leaflet accompanying the original replacement catalytic converter, or*
- *on the packaging in which the original replacement catalytic converter is sold, or*
- *or by any other applicable means.*

In any case, the information must be available in the product catalogue distributed to points of sale by the vehicle manufacturer.

5.3.8.3. The vehicle manufacturer shall provide to the technical service and/or approval authority the necessary information in electronic format which makes the link between the relevant part numbers and the type approval documentation.

This information shall contain:

- *make(s) and type(s) of vehicle,*
- *make(s) and type(s) of original replacement catalytic converter,*
- *part number(s) of original replacement catalytic converter,*
- *type-approval number of the relevant vehicle type(s).*

ISSUE

A strict interpretation of the legislation would be that the original replacement catalyst must always be marked with the vehicle manufacturer's name or trademark even when the power train assembly is sourced from a different manufacturer under a joint venture agreement. In cases when the same power train is used in several different brands of vehicle (e.g. Ford Group, VW Group, joint venture agreements, etc.) this means that the catalyst would have to be re-tooled to separately identify each of the relevant vehicle brands.

However, it is VCA's opinion that the purpose of this marking requirement is simply to provide a direct link between the vehicle and the original replacement catalyst and thereby allow manufacturers to avoid the need for 'e' marking.

Hence, provided that the vehicle manufacturer's Annex II documentation for the vehicle approval and the documentation supplied with the original replacement catalyst show matching information (catalyst details, the vehicle manufacture' name or trademark and the name or trademark shown on the catalyst), it would be acceptable for the vehicle manufacturer to use the engine manufacturer's name or trademark for the catalyst.

TAAM DISCUSSION

Possibilities of solution	Comments

	A	It is acceptable for a vehicle manufacturer, which uses an engine assembly from another manufacturer, to use that engine manufacture's name or trademark to identify the vehicle's original replacement catalyst.	The engine manufacturer's name or trademark shown on the catalyst must be identified in the vehicle manufacturer's approval documentation and in the documentation supplied with the original replacement catalyst
	B	The vehicle manufacturer must use its own name or trademark to identify an original replacement catalyst even when using an engine assembly from another manufacturer.	

Solution:
All delegates agreed solution A

4.2 Review of member state's legal positions regarding "Rollover Stability. ECE Regulation 111" – Poland 4 (Paris 6.19)

Question:

Directive : ECE REGULATION: NO. 111
Subject : ROLLOVER STABILITY
ISSUE A:
If a calculation method is used as an alternative method according to point 5.3.1.2, is it acceptable to add to TA comunication :
A) only the calculation report as specified in Annex 4 – Appendix?, or
B) is it required to add all the detailed calculations?
ISSUE B:
Provisions stipulated in 9.7.5.2 of European Agreement of ADR (International Carriage of Dangerous Goods by Road) relates to the lateral stability according to ECE Regulation No. 111 concerning the tank vehicles first registered as from July 1st 2003.
A) what is to be understood by first registration:
- is that the date in the countries who are contracting parties of ADR, or
- the date in a country where it is currently being operated?

B) is it expected and if so, when roll-over stability shall need to be checked for tank vehicles registered before 30.06.2003?
ISSUE C:
In Regulation No. 111 point 2.2 mentions different characteristics of tank vehicles.
Can we choose one version of a type with the most unfavorable lateral stability and after these tests issue a homologation certificate for all other types?

Solution:
Most of the delegates had no opinion on both issues. It still remained a little dark so probably it could be studied in next meeting (Item discussed on 10th March).

4.3 General items

No general items were discussed.

5. Items related to framework directive 70/156 EC (motor vehicles)

5.1 Statutory plates and inscriptions (76/114 EC) Sweden 2

Question:

SUBJECT: Statutory plates and inscriptions

DIRECTIVE: 76/114/EEC last amended by 78/507/EEC

RELEVANT SECTION:

76/114/EEC
3.2. The identification number must, moreover:

3.2.1. be marked on the chassis, frame or other similar structure, on the righthand side of the vehicle;

3.2.2. be placed in a clearly visible and accessible position by a method such as hammering or stamping,
in such a way that it cannot be obliterated or deteriorate.

94/20/EC see definition of drawbar: item 2.1.5

QUESTION / PROBLEM /CONCERN:

When deciding the location of the identification number (VIN), can that marking be located on a part that can be dismounted, for example a location on a drawbar which has an EC-type approval according to 94/20/EC.

	A	Identification number can not be marked on parts that may be dismounted.	As a drawbar has an approval as a component according to 94/20/EC for coupling devices Sweden find this solution not acceptable.
	B	Identification number can be marked on parts that may be dismounted.	

Solution:
All members agreed with solution A but some countries would consider special cases (i.e. O2 vehicles).

5.2 Application of 76/114 EC Commission 3

Question:

A question has been brought to the Commission's attention whether the 'Vehicle Identification Number' needs to be engraved on the chassis, frame or similar structure or if it is possible to use a plate which is only riveted or screwed to the chassis. The latter seems to be in contradiction with item 3.2.2. of the Annex to Directive 76/114/EEC.

Solution:
The meeting agreed that, in principle, the VIN marking on the vehicle chassis (as opposed to the Manufacturer's VIN plate) should be directly stamped or engraved directly on to the vehicle chassis/body-structure. It should not, therefore, be on a plate that is screwed, riveted or spot welded to a chassis member. A fully seam-welded plate might be acceptable but only in special circumstances and at the discretion of the Type approval authority.

5.3 Date of origin for existing type UK 2

Question:

ISSUE

EC Directives for the approval of vehicle systems typically have two implementation dates one for new types and one for existing types.

The test programme for certification of all the vehicle systems necessary for an EC Whole Vehicle approval can be spread over several months.

During this time the requirements for an amending version of a Directive can come into force for new types but may not yet be necessary for existing types.

For example, the implementation dates for the new Indirect Vision Directive 2003/97/EC (which repeals 71/127/EEC, as amended by 88/321/EEC) are as follows:

Article 2

2. With effect from 26 January 2006, Member States shall refuse to grant EC type-approval for any new type of vehicle on grounds relating to the device for indirect vision or for any new type of device for indirect vision, if the requirements of this Directive are not fulfilled.
However, this date shall be postponed by 12 months as regards the requirements concerning a class VI front mirror as a component and its installation on vehicles.

3. With effect from 26 January 2006, Member States shall prohibit the national type-approval for any new type of vehicle on grounds relating to the device for indirect vision if the requirements of this Directive are not fulfilled.
However this date shall be postponed by 12 months as regards the requirements concerning a class VI front mirror as a component and its installation on vehicles.

4. With effect from 26 January 2010 for vehicles of categories M_1 and N_1, and with effect from 26 January 2007 for all vehicles of other categories, Member States:
— *shall consider certificates of conformity which accompany new vehicles in accordance with the provisions of Directive 70/156/EEC to be no longer valid for the purposes of Article 7(1) of that Directive,*
— *shall prohibit the sale, registration or entry into service of vehicles,*
on grounds relating to the device for indirect vision if the vehicles do not comply with the requirements of this Directive.

Hence, vehicle types already in existence before 26 January 2006 and already approved to 88/321/EEC can continue to use the 88/321/EEC approval until 26 January 2010.

The key question, however, is:
Can a systems approval to 88/321/EEC granted during a test programme for a new vehicle type in, say, September 2005 can still be accepted for an EC Whole Vehicle approval for that vehicle if the Whole Vehicle approval is not issued until after 26 January 2006?

A similar study of the new Pedestrian Safety Directive 2003/102/EC provides an interesting comparison:

Article 2

2. With effect from 1 October 2005, Member States shall no longer grant:
— *EC type-approval, or*
— *national type-approval,*

except where the provisions of Article 8(2) of Directive 70/ 156/EEC are invoked, for any type of vehicle on grounds relating to pedestrian protection if the technical provisions set out in section 3.1. or 3.2. of Annex I are not complied with.

5. With effect from 31 December 2012, Member States shall:

— consider certificates of conformity which accompany new vehicles in accordance with the provisions of Directive 70/ 156/EEC to be no longer valid for the purposes of Article 7(1) of that Directive, and

— prohibit the registration, sale and entry into service of new vehicles which are not accompanied by a certificate of conformity in accordance with Directive 70/156/EEC,

on grounds relating to pedestrian protection if the technical provisions set out in section 3.1. or 3.2. of Annex I are not complied with.

For this legislation vehicle types already existing before 1 October 2005 do not need to comply until December 2012. However, in this case, the existing vehicle types can only be considered in the context of an EC Whole Vehicle Approval because there is no preceding vehicle systems Directive to 2003/102/EC and hence there can be no existing vehicle systems approvals.

This would therefore lead to the conclusion that it is the EC Whole Vehicle date that determines the acceptability of Directive used for the various system approvals not the date when the system approval itself was issued.

TAAM DISCUSSION

	Possibilities of solution		Comments
	A	When considering the appropriate Directive level for systems approvals submitted for a new 70/156/EEC (as amended) Whole Vehicle approval, a vehicle will be considered to be a New Type at the time of the Whole Vehicle certification. In this case all the systems approvals will have to be to the latest level required for New Vehicle Types at the time the Whole Vehicle Approval is granted irrespective of the date when the individual systems approvals were actually issued.	
	B	When a vehicle is presented for European Whole Vehicle Approval the requirements related to New Types and Existing Types will be considered separately against each of the separate EWVTA subjects and will therefore be based on the issue date for that systems approval and not on the issue date for the Whole Vehicle Approval	

Solution:
Most of the delegates agreed that this is a very tricky question. It was stated by several countries that solution would depend on the wording of separate directive. Some other member states would be in favour of solution A but anyway it was proposed to postpone it to next meeting.

5.4 End of series vehicles UK 6

Question:

ISSUE
The motor vehicle framework directive – 70/156/EEC contains provisions whereby Member States may register and permit the sale or entry into service of new vehicles conforming to a type of vehicle whose type – approval is no longer valid under Article 5.5
Limits governing the number of vehicles which are permitted for registration are given in Annex XII B.

B. END-OF-SERIES LIMITS
The maximum number of complete and completed vehicles put into service in each Member State under the procedure "end-of-series" shall be restricted in one of the following ways to be chosen by the Member State:
either
1. the maximum number of vehicles of one or more types may, in the case of category M_1, not exceed 10 % and in the case of all other categories not exceed 30 % of the vehicles of all types concerned put into service in that Member State during the previous year.
Should 10 %, respectively 30 %, be less than 100 vehicles, then the Member State may allow the putting into service of a maximum of 100 vehicles, or
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 because of coming into force of a separate Directive.
A special entry shall be made on the certificate of conformity of the vehicles put into service under this procedure.

VCA are interested in which of the above solutions each Member State Permits

TAAM DISCUSSION

	Possibilities of solution		Comments
	A	B1 : 10% of previous years registrations of that type or 100 vehicles, whichever is greater, for M1.	
	B	B2 : Vehicles built (or present in the EC) 3 months before the date given in the Directive. Example. Directive specifies compliance by 1 Jan 2005. Permit registrations of vehicles built BEFORE 1 Oct 2004. Vehicles built AFTER 1 Oct 2004 MUST be registered BEFORE 1 Jan 2005.	U.K. use 3 month rule only.

Solution:
The meeting agreed that, for End-of-Series, a Member State can use either Solution A or solution B for each application but it cannot mix the requirements.

5.5 Bodywork for N1 vehicles Spain 4

Question:

Issue
Characteristics of braking devices in cuadricycles
Prescription
2.2.4. Every tricycle (L5e or L7e) must be equipped with:
2.2.4.1. a foot-controlled serviced braking device which operates on all wheels,

Possibilities of solution			Comments
	A	It's NOT possible to grant an approval (93/14) for ATV vehicles with a braking device where the pedal only control the rear axle, consequently the WVTA it's imposible	
	B	Yes it's possible to grant 93/14 and 2002/24 CE	
	C	In any case the prescriptions of minImun deceleration when the pedal is operated must be 5.0 m/sg2 which corresponded to combined brake system.	

Comment

In the directive 2002/24 (Scope and definitions) the Art 1 . 3.b define :Cuadricycles …….These vehicles shall be considered to be motor tricycles and shall fulfil the technical requirements applicable to motor tricycles of category L5e unless specified differently in any of the separate Directives.

Solution:
Most of the delegates agreed that BA body style would be correct but considering the wording it could be consider as BB body style as well. However it was remarked that more body styles in directives are very needed.

5.6 Classification of the type Germany 3

Question:

Issue

In the separate directives are different classifications of the vehicle types common.

Type of vehicle means vehicles which do not differ essentially as regards the following parts:

e.g.

70/157/EEC: inter alia, rated maximum power and corresponding engine speed(s))

80/1269/EEC and 88/77/EEC: no specification for the classification of types

70/220/EEC: Characteristics of the vehicle and engine according to Annex II (Information documents)

Problem:

An applicant ist asking, if one engine with different maximum power (e.g. 88 kW and 110 kW), given only throug the engine control unit could get one sound approval (with only one measurement, worst case). This engine is still approved as one type according to the 80/1269/EEC.

The KBA wants to know how the other authorities consider this case?

Solution:

Every country explained the way they worked and seemed to be very different one to each other. Most of them work either with tolerances or worst case. However Commission considers very difficult to identify which is the worst case and consequently two type approval certificates should be needed.

5.7 Type approval certificate and CoC Poland 2

Question:

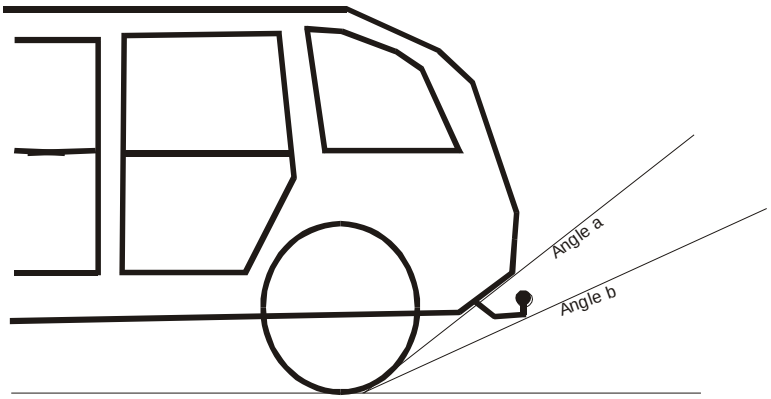
BACKGROUND
The pace of discussion on the recast version of the framework directive taking place in Brussels does not allow too lengthy discussion.
Question:
The Polish delegation would therefore appreciate detailed position from other countries on the proposal.

Solution:
Member states thanked Poland for the question but other forums seemed to be better suited for this.

5.8 Off road vehicles (symbol G) Spain 2

Question:

Issue
According to the "OFF-ROAD VEHICLE (symbol G)" definition in Annex II, is needed to measure the departure angle. If the vehicle is approved according to 94/20, should that angle be measured considering the coupling device?



	Possibilities of solution		Comments
	A	Yes, it should be measured considering the coupling (Angle b).	
	B	No, it should not be measured considering the coupling (Angle a)	

Solution:
This question was slightly discussed in Paris but no agreement was reached. In this case all member states agreed:

If vehicle is approved according to 94/20 EC and there is a fixed coupling then the departure angle should be considered (Solution A, angle b).

If there is a detachable coupling, then the departure angle should be measured without the coupling (Solution B, angle a)

5.9 Special purpose vehicles from existing M1 Spain 3

Question:

Issue

Some Spanish manufacturers are working in special purpose vehicles from existing M1 complete vehicles from regular market, in example ambulances for people transportation from vehicles such as Mercedes-Benz Vito or Sprinter, Fiat Ducato, Opel Movano etc, which are approved as complete vehicles (without incomplete variants), or hearses from wagon model cars such as Mercedes-Benz E class, Volvo V70, BMW 5 series etc, always approved only as a complete vehicle.

The modifications introduced in the vehicle to be adapted for ambulances or hearses, are mainly related to interior changes and/or rear overhang dimensions.
Is it possible to grant an M1 completed vehicle approval when the base vehicle is a complete vehicle?

Possibilities of solution			Comments
	A	Yes.	
	B	No.	

Solution:
This question was discussed in TAAM a few years ago and solution A was accepted.

5.10 Marking of emission approval Finland 1

Question:

The list of separate approvals of the type approval document:
The emission approval according to 70/220/EEC always indicates also the emission level A or B (EURO3 or EURO4). Should this information also be available on emission approvals according to ECE83?

1. Yes, the marking of the emission approval equal to 2001/100B should be E83RII/05 and 2001/100A should be E83RI/05.

2. No, the marking of the emission stage can only be used on approvals according to 70/220/EEC.

COUNTRY PROPOSAL / SUGGESTION:

1. Yes, the marking of the emission approval equal to 2001/100B should be E83RII/05 and 2001/100A should be E83RI/05.

Solution:
All Member States agreed with Finnish interpretation.

5.11 Trade Mark of original replacement catalysts UK 3

Question:

BACKGROUND
Vehicle manufacturers are increasingly co-operating with power train sharing agreements that can result in a vehicle from one manufacturer having engine components that show the brand or trade mark of a different manufacturer (i.e. the one that built and supplied the engine).
2003/76/EC allows original replacement catalysts to be exempt from the requirements of Annex XIII (replacement catalyst testing and approval marking) provided that they are marked with the name or trademark of the vehicle manufacturer and the make and part number of the catalyst.
LEGISLATION
70/220/EEC as amended by 2003/76/EC

Annex I

2.19. "Original Replacement Catalytic Converter"
means a catalytic converter or an assembly of catalytic converters whose types are indicated in point 1.10 of the Appendix to Annex X to this Directive but are offered on the market as separate technical units by the holder of the vehicle type-approval
[Annex X is the vehicle approval Certificate]

5.3.8. Replacement catalytic converters and original replacement catalytic converters

5.3.8.1. Replacement catalytic converters intended to be fitted to EC type-approved vehicles must be tested in accordance with Annex XIII.

5.3.8.2. Original replacement catalytic converters, which are of a type covered by point 1.10 of the Appendix to Annex X and are intended for fitment to a vehicle to which the relevant type-approval document refers, do not need to comply with Annex XIII to this Directive provided they fulfil the requirements of sections 5.3.8.2.1 and 5.3.8.2.2.

5.3.8.2.1. Marking
Original replacement catalytic converters shall bear at least the following identifications:

5.3.8.2.1.1. the vehicle manufacturer's name or trade mark;
5.3.8.2.1.2. the make and identifying part number of the original replacement catalytic converter as recorded in the information mentioned in point 5.3.8.3.

5.3.8.2.2. Documentation
Original replacement catalytic converters shall be accompanied by the following information:

5.3.8.2.2.1. the vehicle manufacturer's name or trade mark;
5.3.8.2.2.2. make and identifying part number of the original replacement catalytic converter as recorded in the information mentioned in point 5.3.8.3;
5.3.8.2.2.3. the vehicles for which the original replacement catalytic converter is of a type covered by point 1.10 of the Appendix to Annex X, including, where applicable, a marking to identify if the original replacement catalytic converter is suitable for fitting to a vehicle that is equipped with an on-board diagnostic (OBD) system;
5.3.8.2.2.4. installation instructions, where necessary;
5.3.8.2.2.5. this information shall be provided either:
- *as a leaflet accompanying the original replacement catalytic converter, or*
- *on the packaging in which the original replacement catalytic converter is sold, or*
- *or by any other applicable means.*

In any case, the information must be available in the product catalogue distributed to points of sale by the vehicle manufacturer.

5.3.8.3. *The vehicle manufacturer shall provide to the technical service and/or approval authority the necessary information in electronic format which makes the link between the relevant part numbers and the type approval documentation.*
This information shall contain:
— *make(s) and type(s) of vehicle,*
— *make(s) and type(s) of original replacement catalytic converter,*
— *part number(s) of original replacement catalytic converter,*
— *type-approval number of the relevant vehicle type(s).*

ISSUE

A strict interpretation of the legislation would be that the original replacement catalyst must always be marked with the vehicle manufacturer's name or trademark even when the power train assembly is sourced from a different manufacturer under a joint venture agreement. In cases when the same power train is used in several different brands of vehicle (e.g. Ford Group, VW Group, joint venture agreements, etc.) this means that the catalyst would have to be re-tooled to separately identify each of the relevant vehicle brands.

However, it is VCA's opinion that the purpose of this marking requirement is simply to provide a direct link between the vehicle and the original replacement catalyst and thereby allow manufacturers to avoid the need for 'e' marking.

Hence, provided that the vehicle manufacturer's Annex II documentation for the vehicle approval and the documentation supplied with the original replacement catalyst show matching information (catalyst details, the vehicle manufacture' name or trademark and the name or trademark shown on the catalyst), it would be acceptable for the vehicle manufacturer to use the engine manufacturer's name or trademark for the catalyst.

TAAM DISCUSSION

	Possibilities of solution		Comments
	A	It is acceptable for a vehicle manufacturer, which uses an engine assembly from another manufacturer, to use that engine manufacture's name or trademark to identify the vehicle's original replacement catalyst.	The engine manufacturer's name or trademark shown on the catalyst must be identified in the vehicle manufacturer's approval documentation and in the documentation supplied with the original replacement catalyst
	B	The vehicle manufacturer must use its own name or trademark to identify an original replacement catalyst even when using an engine assembly from another manufacturer.	

Solution:
The Commission noted that only Solution B was actually in line with the wording of the legislation. However, all Type Approval Authorities at the meeting supported the UK proposal and accepted Solution A as a practical and logical approach.

5.12 Replacement catalyst OBD compatibility UK 7

Question:

ISSUE

Amending directive 2003/76/EC introduced requirements for replacement catalyst manufacturers to demonstrate that their parts are compatible with the OBD system of the vehicle for which fitment is intended. Annex XIII section 6.5 introduces these requirements and suggests that the aim of this section is to demonstrate 'compatibility' with the vehicle OBD system. Para 6.5.1 requires demonstration of 'compatibility' using the test procedure given in Annex XI appendix I. This appendix specifies a test procedure for catalyst monitoring shown in 6.4.2.2.

My first concern is that the vehicle OBD system is independent of the catalyst – irrespective of whether or not the catalyst is OEM or aftermarket. Conducting the tests in 6.4.2.2 which simulate a deteriorated / defective catalyst is only testing that the vehicle OBD system works, and not that the replacement catalyst is 'compatible'. The vehicle MIL will be lit when the O2 switching ratio between the pre and post cat O2 sensors reaches a pre-determined, vehicle specific value, which is specified by the vehicle manufacturer and part of the vehicle OBD calibration.

My second point concerns whether or not you would consider that meeting the requirements given in 6.5.4 and 6.5.5 – ensuring that no fault codes were stored prior to commencing the precons and testing, and that there were no fault codes present after the testing had been completed – would on its own be sufficient to satisfy the requirments regarding OBD 'compatibility' ?

6.5. REQUIREMENTS REGARDING OBD COMPATIBILITY (APPLICABLE ONLY TO REPLACEMENT CATALYTIC CONVERTERS INTENDED TO BE FITTED TO VEHICLES EQUIPPED WITH AN OBD SYSTEM)

OBD compatibility demonstration is required only when the original catalyst was monitored in the original configuration.

6.5.1. The compatibility of the replacement catalytic converter with the OBD system shall be demonstrated by using the procedures described in Directive 98/69/EC, Annex XI, Appendix 1.

6.5.2. The provisions of Directive 98/69/EC, Annex XI, Appendix 1 applicable to components other than the catalytic converter shall not be applied.

6.5.3. The aftermarket manufacturer may use the same preconditioning and test procedure as used during the original type-approval. In this case, the type-approval authority shall provide, on request and on a non-discriminatory basis, Appendix 2 to the EC type-approval certificate which contains the number and type of preconditioning cycles and the type of test cycle used by the original equipment manufacturer for OBD testing of the catalytic converter.

6.5.4. In order to verify the correct installation and functioning of all other components monitored by the OBD system, the OBD system shall indicate no malfunction and have no stored fault codes prior to the installation of any of the replacement catalytic converters. An evaluation of the status of the OBD system at the end of the tests described in point 6.2.1 of this Annex may be used for this purpose.

6.5.5. The MI (reference section 2.5 of Annex XI to this Directive) must not activate during vehicle operation required by point 6.2.2 of this Annex.

VCA are interested in which of the test scenarios each Member State requires

TAAM DISCUSSION

Possibilities of solution			Comments
	A	Require demonstration of compliance with catalyst monitoring requirements 6.5.1 / 6.5.2 AND requirements regarding no fault codes 6.5.4 / 6.5.5	

	B	Require demonstration regarding no fault codes from 6.5.4 / 6.5.5 ONLY	U.K. support this option.
	C	Other	

Solution:
The meeting faced the same problem as in a previous question. General comment is that solution A is the right one (mandatory) but solution B could be accepted and several countries supported this option.

5.13 Emission from motor vehicles (70/220 EC) Switzerland 1

Question:

Background

Type VI "Cold temperature emissions test at -7°C" must be carried out on all vehicles of Category M_1 and N_1, Class I, with a maximum mass of 2'500 kg equipped with a positive-ignition engine - except vehicles that run on a gaseous fuel (LPG or CNG) - and not more than six occupants. This prescription is applicable to new types of vehicles from January 1, 2002.
There is a vehicle type M_1 which has been homologated by an EC whole vehicle type approval before January 1, 2002. Now the manufacturer claims for this vehicle type, actually classified in Switzerland as EURO 3, to get the EURO 4 stage without doing the Type VI test by saying the mandatory date applies to new types only (homologation from January 1, 2002), and there is no mandatory date for existing types with older homologation in the current regulation. According to Directive 70/220/EEC each single vehicle must fulfill EURO 4 standards from January 1, 2006.
The concerned vehicle type fulfills Type I test limit values (normal temperature tailpipe emissions) according to EURO 4 level as well as all the other mandatory tests (Types II , III, IV and V) for getting the EURO 4 stage with the exception of the above mentioned Type VI test. In some other countries this vehicle type has got tax incentives due to its "partial EURO 4 stage".
Major Concern
Switzerland is of the opinion that this vehicle type should not get the EURO 4 stage without fulfilling the whole test series including the Type VI test. If we would grant EURO 4 stage to this vehicle type without fulfilled Type VI test the consequences could lead to the situation that vehicles not having a Type VI test may allowed to put into service up to approximately 2010/2011 when EURO 5 will become mandatory. But this we think was never the intention of the EU Members when they laid down the rules for the transitional provisions for passing from EURO 3 to EURO 4 emission limits.
May we ask your opinion? Please fill in the corresponding character.
Question:

A) EURO 4 stage should be granted to vehicle types without Type VI cold temperature emissions test (-7°C) if they are homologated before January 1, 2002. B) EURO 4 stage should not be granted to vehicle types having not successfully passed the Type VI cold temperature emissions test (-7°C) even if they are homologated before January 1, 2002.	Answer:

Solution:
Some Member States have no clear position or find no simple answer to this question but some others had a very defined position (either A or B) so there was not an agreement.

5.14 Engine heat storage system UK 9

Question:

BACKGROUND

Some vehicle manufacturers are offering systems that are able to remotely store heat from the engine coolant away from the engine block and then use that heat to provide a faster warm up time for the engine when it is next started from cold. The benefits are improved cold start emissions and reduced fuel consumption and the UK Government supports these devices.

The legislative tests for which these systems need to be considered (reference 70/220/EEC as amended by 2003/76/EC) are the Type I test and the Type VI test. Both tests specify a soak time to stabilise the vehicle's engine temperature to the ambient temperature of the test cell prior to the start of the test. The legislation also states that the engine must be started according to the manufacturer's instructions.

LEGISLATION 70/220/EEC as amended by 2003/76/EC *ANNEX III*

TYPE I TEST

5.3. PRECONDITIONING OF THE VEHICLE

5.3.1. For compression-ignition engine vehicles for the purpose of measuring particulates at most 36 hours and at least six hours before testing, the Part Two cycle described in Appendix 1 must be used. Three consecutive cycles must be driven. The dynamometer setting is as indicated in 5.1 and 5.2. At the request of the manufacturer vehicles with positive ignition engine may be preconditioned with one Part I and two Part II driving cycles.[96/44-103]

After this preconditioning specific for compression ignition engines and before testing, compression-ignition and positive ignition engine vehicles must be kept in a room in which the temperature remains relatively constant between 293 and 303 ^{O}K (20 and 30 ^{O}C). This conditioning must be carried out for at least six hours and continue until the engine oil temperature and coolant, if any, are within ± 2 ^{O}K of the temperature of the room.

If the manufacturer so requests, the test must be carried out not later than 30 hours after the vehicle has been run at its normal temperature.

6.2. STARTING-UP THE ENGINE

6.2.1. The engine must be started up by means of the devices provided for this purpose according to the manufacturer's instructions, as incorporated in the driver's handbook of production vehicles.

6.2.2. The first cycle starts on the initiation of the engine start-up procedure.

ANNEX VII

4.3. SOAK METHODS

4.3.2. Standard method. The vehicle is stored for not less than 12 hours nor for more than 36 hours prior to the low ambient temperature tailpipe emission test. The ambient temperature (dry bulb) during this period must be maintained at an average termperature of:

266 °K (-7 °C) ± 3 °K during each hour of this period and must not be less than 260 °K (-13 °C) nor more than 272 (-1 °C). In addition, the temperature may not fall below 263 °K (-10 °C) nor more than 269 °K (-4 °C) for more than three consecutive minutes.

5.3.1. The provisions of sections 6.2 to 6.6, excluding 6.2.2, of Annex III apply in respect of starting the engine, carrying out the test and taking the emission samples. The sampling begins before or at the initiation of the engine start-up procedure and ends on conclusion of the final idling period of the last elementary cycle of the part one (urban driving cycle), after 780 seconds.

ISSUE

VCA's opinion is that these types of engine heat storage systems do not need special provisions and hence can be approved according to 70/220/EEC, as amended by 2003/76/EC, provided the prescribed

vehicle soak procedures in Annex III and Annex VII are followed and the engine is started in accordance with the manufacture's instructions.

TAAM DISCUSSION

Possibilities of solution Comments

	A	Heat storage systems of the type described in this paper can be approved under the existing provisions of 70/220/EEC as amended by 2003/76/EC.	
	B	70/220/EEC must be amended to make special provisions for the testing and approval of heat storage systems.	

Solution:
General agreement for answer A but Type Approval Authorities / Technical Services must take full account of worst case criteria and must ensure that the heat storage system is not a 'defeat device'.

5.15 Turntable in coupling devices 94/20 EC Netherlands 5

Question:

Directive	: 94/20/EC
Subject	: turntable

Annex	: Annex I
Paragraph	: -
Point	: 2.1

Text	:	2.1 Mechanical couplings devices between motor vehicles and trailers are all parts and devices on the frames, load-bearing parts of the bodywork and chassis of the vehicles by means of which towing and towed vehicles are connected together. It also includes fixed or detachable parts for the attachment, adjustment or operation of the abovementioned coupling devices.

Question	: Is a turntable, as used in e.g. a trailer, part of the coupling device according the definition, that should be tested accordingly?

Solution:
Although not clearly in the scope of directive, most of the Member States do not consider a turntable as part of the coupling device.

5.16 Suitability to use calculation for approval of coupling devices on drawbars for O4 vehicles Sweden 4

Question:

Some coupling devices have been recalled from the Swedish market because problem with cracks has occurred. In some cases these approvals were granted after calculating the strength. In Sweden we allow trailer combinations up to 60 tonnes and this is trying for these drawbars. We have in Sweden made some approvals of drawbars and have found that it can be difficult to provide constructions that cope with the demands on strength. These approvals are based on static and vertical tests. The manufacturer has to make a very rigid construction that can not compete in weight with some similar drawbars that are approved by calculation.

	A	Calculation is not a suitable method for approval of drawbars for O4-vehicles.	
	B	Calculation is a suitable method for approval of drawbars for all trailers.	

Solution:
After explanations of several cases from different Member States it was decided to clarify in next TAAM.

5.17 Warning signal ABS failure (71/320 EC) Netherlands 2

Question:

Directive	:	71/320
Subject	:	warning signal ABS failure

Annex	:	X
Paragraph	:	
Point	:	4.1, 4.1.1 and 4.1.2

Text	:	4.1. Any electrical failure or sensor anomaly that affects the system with respect to the functional and performance requirements in this Annex, including those in the supply of electricity, the external wiring to the controller(s), the controller(s) (2) and the modulator(s) shall be signalled to the driver by a specific optical warning signal. 4.1.1. The warning signal shall light up when the anti-lock braking system is energised and, with the vehicle stationary, it shall be verified that none of the above-mentioned defects are present before extinguishing the signal. 4.1.2. The static sensor check may verify that a sensor was not functioning the last time that the vehicle was at a speed greater than 10 km/h (3). Also during this verification phase, the electrically controlled pneumatic modulator valve(s) shall cycle at least once.

Question	:	Shall the loosening of the cable to the sensor while the ABS is energized and the vehicle stationary be signalled to the driver?

Suggestion	:	No, the general rule is “specified failures or defects which should activate the warning signals, but which are not detected under static conditions, shall be stored upon detection and be displayed at start-up and at all times when the ignition (start) switch is in the “on” (run) position, as long as the failure or defect persists”.

Solution:
The meeting agreed that there was no requirement for the warning signal when the vehicle is stationary (but the warning signal should lit up when the vehicle is next in motion)

5.18 Child restrain systems of the non-integral class Netherlands 8

Question:

Directive	:	77/541/EC safety belt and restraint systems / ECE Reg.44 Child Restraint Systems
Subject	:	Child Restraint systems of the non-integral class

Annex	:	in text Regulation, chapter Definitions
Paragraph	:	2.1.3. (definition non-integral class)
Point	:	2.1.3.3 (definition guide strap)

Text	:	2.1.3.	Child restraint systems may be of two classes: an integral class comprising a combination of straps or flexible components with a securing buckle, adjusting device, attachments, and in some cases a supplementary chair and/or impact shield, capable of being anchored by means of its own integral strap or straps; a non-integral class that may comprise a partial restraint, which, when used in conjunction with an adult belt, which passes around the body of the child or restrains the device in which the child is placed, forms a complete child restraint system;
		2.1.3.1.	'partial restraint' means a device, such as a booster cushion, which, when used in conjunction with an adult seat belt, which passes around the body of the child or restrains the device in which the child is placed, forms a complete child restraint system;
		2.1.3.2.	'booster cushion' means a firm cushion, which can be used with an adult seat belt;
		2.1.3.3.	'guide strap' means a strap which constrains the shoulder strap of the adult seat belt in a position to suit the child and where the effective position at which the shoulder strap changes direction can be adjusted by means of a device which can be moved up and down the strap to locate the wearer's shoulder, and then locked into that position. This guide strap is not meant to carry a significant part of the dynamic load.

Question	:	A manufacturer claims that a "guide strap" (see pictures) on its own could be approved as a child restraint of the non-integral class. What is the view of other TAA concerning the type approval of this "guide strap"?

Suggestion	:	This kind of "guide strap" makes use of the (front or rear) seat back to a far too high degree. The definition of "guide strap" only focuses on the route of the adult belt over the shoulder of the child, therefor neglecting the required position of the belt on the pelvis of the child (6.2.2.). It is also unknown what forces will be introduced on the seatbelt and the mounting points of the (adult) seatbelt. In the opinion of the RDW it is impossible that such a "guide strap" forms a complete child restraint system. Therefor this "guide strap" cannot be type approved according to 77/541/EC or ECE R44.

Decision	:	- Approval as a complete child restraint system for a piece of equipment such as this "guide strap" is not possible. - Placing the definition of "guide strap" under 2.1.3. gives the impression that it can be approved as a non-integral class of child restraint. The definition of "guide strap" should be moved from 2.1.3 and placed on its own somewhere in the row of definitions, just like the definition of "impact shield". RDW will draw up a proposition for amending both Directive and Regulation. *(concerning the approval certificate there is no change necessary because under point 1.2. where you strike out what does not apply there are only mentioned: "Integral/non-integral/partial child restraint/booster cushion". You can also conclude from this that a child restraint approval for a "guide strap" is not possible!)*

Solution:
General agreement for Netherlands position. In fact there is a discussion for non acceptance in Geneva.

5.19 Acceptability of EUROSID 2 Dummy UK 4

Question:

BACKGROUND

The European Commission is not a current signatory to ECE Regulation 95 and the Regulation is therefore not acceptable as an alternative to 96/27EC for the purposes of European Whole Vehicle Approval (reference Annex 4 of 70/156/EEC as amended). This means that Manufacturer's wishing to also sell vehicles outside Europe need to obtain approvals to both 96/27/EC and ECE R95.

Until recently this has not been a problem because the technical requirements for 96/27/EC and ECE R95.01 are the same and it has therefore been possible to conduct one test to cover certification of a vehicle to both the Directive and the Regulation.

However, ECE R95 has now been updated and the latest version (ECE R95.02 Supplement 1) now differs from 96/27/EC in terms of the barrier specifications and the dummy specifications.

ISSUE

The question is whether it is possible to still conduct just one side impact test that would be deemed to meet the requirements of both 96/27/EC and ECE R95.02.

TAAM DISCUSSION

	Possibilities of solution		Comments
	A	Yes, it is acceptable to use the ES-2 dummy as an alternative to EUROSID-1 for an approval to 96/27/EC	ES-2 has been developed to replace EUROSID-1 and, as such, provides more representative results
	B	It would only to possible to use an ES-2 dummy for approval to 96/27/EC if the approval is supported by an 8.2.(c) application	

Solution:

Most of the member states understand that is not possible to use Eurosid 2 unless an article 8.2.c is applied but most of them confirm that manufacturers are very reluctant with this. Some Member States would accept a test done with Eurosid 2.

5.20 95/54 EC Type approval acceptance France 2

Question:

Issue:
From the 1 July 2006, the new vehicles and the new ESA will have to comply with the directive 2004/104/EC. In the 2004/104/EC type-approval of the new vehicles, the ESA fitted to the car can be covered by their own type-approval.
However these equipments with no modification (justifying new type-approval) could have been type-approved according to the 95/54/EC directive since they are not submitted to the date of new types but only to the date of all types (1 January 2009).

Question:

Can we integrate 95/54/EC type-approval of equipments in 2004/104/EC type-approval of a new type vehicle file (before 1 January 2009)?

Can we integrate 2004/104/EC type-approval of equipments in 95/54/EC type-approval of a vehicle file at time of an extension?

Prescriptions

- 95/54/EC
- 2004/104/CE

	Possibilities of solution		Comments
	A1	Yes	only 2004/104/EC equipments type-approval certificates could be integrated in the 2004/104/EC vehicle type-approval file
	A2	Yes	2004/104/EC equipments type-approval certificates can be accepted in a 95/54/EC vehicle type-approval file
	B	No	ESA type approved according to directive 95/54/EC may equip new type of vehicles to be approved according to 2004/104/EC

Solution:
The meeting consensus was in support of Solutions A1 and A2

5.21 Authentication of Annex III C Certificate UK 8

Question:

ISSUE

Annex I paragraph 3.2.9 allows manufacturers to make an application for exemption from Type Approval for components that are not related to immunity-related functions. This application is processed by a Technical Service which (if the application is accepted) will issue a Certificate to confirm that the component is not immunity-related.

However, according to Annex III C, the certificate needs to be authenticated with the 'stamp of administration' in the same way as the formal approval certificates Annexes III A and III B. The 'stamp of administration' would normally be seen as the stamp of the Type Approval Authority.

Does this mean that, even though a recognised Technical Service is able to process the Declaration for Conformity, the final certificate should still be authenticated by the Type Approval Authority before it is formally issued?

LEGISLATION

ANNEX 1

3.2.9. Components sold as aftermarket equipment and intended for the installation in motor vehicles need no type-approval if they are not related to immunity-related functions (Annex I, 2.1.12). In this case a Declaration of Conformity according to the procedures of Directive 89/336/EEC or 1999/5/EC must be issued. Part of this declaration must be that the ESA fulfils the limits defined in paragraphs 6.5, 6.6, 6.8 and 6.9 of Annex I to this Directive.

During a transition period of four years after coming into force of this Directive the responsible for placing on the market of such a product has to submit all relevant information and/or a sample to a technical service which will determine if the equipment is immunity-related or not. The result of the inspection shall be available within three weeks and not require additional testing.

A document according to the example given in Annex III C shall be issued by the technical service within the same period. Member States shall report, by a date three years from the entry into force of this Directive, any cases of refusals on safety grounds. Based on the practical experience with this requirement and based on the reports submitted by Member States, it will be decided, according to the procedure referred to in Article 13 of Directive 70/156/EEC, and before the end of the transition period, if this document is still required in addition to the Declaration of Conformity.

ANNEX III C – MODEL

(maximum format: A4 (210 × 297 mm))

ATTESTATION WITH REGARD TO ANNEX I, 3.2.9.

** Stamp of administration **

Applicant:

General description of product:

Information submitted by the applicant:

This ESA can be used on any vehicle type with the following restrictions:

Installation conditions, if any:

We confirm that the product described above is not immunity-related according to Directive 72/245/EEC, as last amended by Directive 2004/XX/EC. Any testing according to immunity as defined in this Directive is not required.
Technical service responsible for evaluation:

Place:

Date:

Signature:

TAAM DISCUSSION

Possibilities of solution			Comments
	A	Although the Declaration of Conformity can be processed by a Technical Service, the Annex III C Certificate must be authenticated by the Type Approval Authority	
	B	The Type Approval Authority can choose not to be involved and can allow the Annex III C Certificate be authenticated by the Technical Service.	

Solution:
Some Member States supported position A and some others position B. In the meantime, the meeting accepted the advice of the Commission and agreed that it is not necessary for the Type Approval Authority to get directly involved in Annex III C certification.

5.22 RF Transmiters installation France 1

Question:

Issue:

In the annex I §3.1.8 of the 2004/104/EC directive: "The vehicle manufacturer must provide a statement of frequency bands, power levels, antenna positions and installation provisions for the installation of RF-transmitters, even if the vehicle is not equipped with RF transmitter at time of type-approval. This should cover all mobile radio services normally used in vehicles. This information must be made publicly available following the type-approval. Vehicle manufacturers must provide evidence that vehicle performance is not adversely affected by such transmitter installations."

Question:

What kinds of evidence have been asked in this paragraph?

Prescriptions

- 2004/104/EC

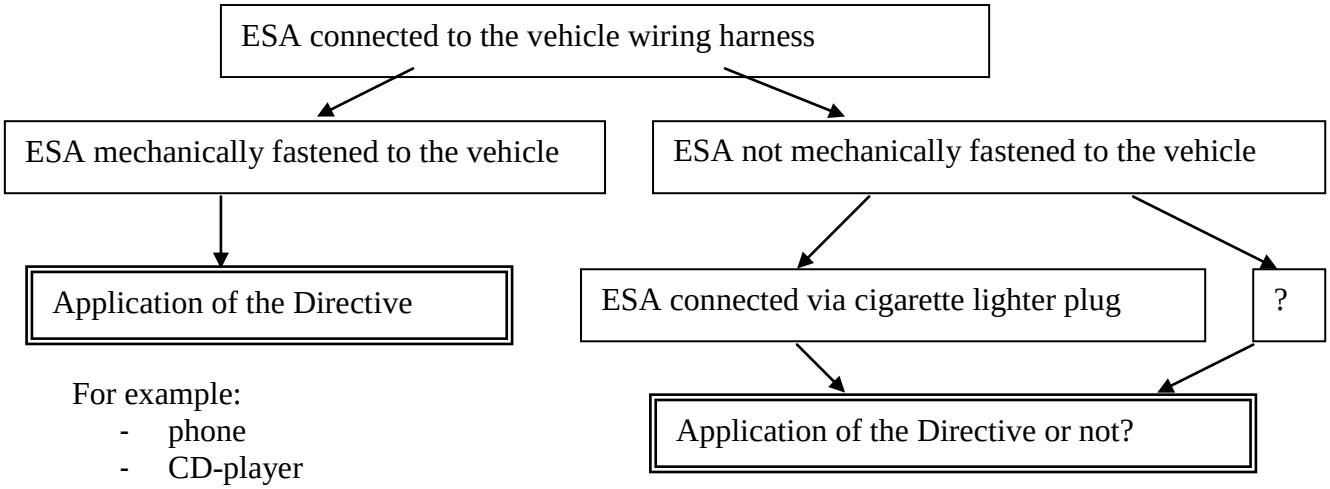
	Possibilities of solution		Comments
	A	Yes	Evidence that vehicle performance is not affected is demonstrated by the vehicle manufacturer by submitting tests reports according for example to ISO 11 451-3, or equivalent. This test reports shall not to be included in the technical file.
	B	No	No test report shall be ~~have been~~ submitted to the technical service.

Solution:
General agreement for solution A but some Member States would accept a declaration of the manufacturer instead of a test report.

5.23 Application of EMC to ESA's Finland 5

Question:

1. For which electrical/electronic subassemblies (ESAs) the Directive is applied? How mobile phones, laptops etc. should be treated?
2. How do the Member States understand the wording "an interface" in Paragraph 3.2.1 (in Table): should it be understood that the Directive is not applied for such devices that can be connected to the vehicle f. ex. via cigarette lighter plug?
3. Do the Member States still recognize also the type-approvals granted accordind to ECE 10/02?



For example:
- phone
- CD-player
- GPS

For example:
- mobile phone
- laptop
-

Solution:
Most of the member states understand that the interface (connection between ESA and the car) is clearly in the scope of directive which is not the case for ESA in itself.
The meeting also recognised that, according to Annex IV of the Framework Directive, ECE R10.02 is still an acceptable equivalent to 2004/104/EC.

5.24 End outline marker lamp Sweden 1

Question:

DIRECTIVE: 76/765/EEC last amended by 97/28/EC (ECE R48.01)

RELEVANT SECTION: ECE R48, Rev 01, 6.13 (+ 6.9 and 6.10)

6.9 FRONT POSITION LAMP

6.9.1 Presence: Mandatory on all motor vehicles. Mandatory on trailers over 1,600 mm wide. Optional on trailers which are not more than 1,600 mm wide.

6.9.2 Number: Two

6.10 REAR POSITION LAMP

6.10.1 Presence: Mandatory.

6.10.2 Number: Two

6.13 END-OUTLINE MARKER LAMP

6.13.1 Presence: Mandatory on vehicles exceeding 2.10 m in width. Optional on vehicles between 1.80 and 2.10 m in width. On chassis cabs the rear end-outline marker lamps are optional.

6.13.2 Number: Two visible from the front and two visible from the rear.

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6.13.9 Other requirements: Provided that all other requirements are met, the lamp visible from the front and the lamp visible from the rear on the same side of the vehicle may be combined in one device.

The position of an end-outline marker lamp in relation to corresponding position lamp shall be such that the device between the projections on a transverse vertical plane of the points nearest to one another on the apparent surfaces in the direction of the respective reference axes of the two lamps considered is not less than 200 mm.

QUESTION / PROBLEM /CONCERN:

For trailers type O1 and O2 with the width over 2.10 m it is sometimes hard to find a suitable place for both front/rear position lamps and end-outline marker lamps. Se pictures. It is also regulated that the distance between two position lamps not shall be closer than 200 mm.

	A	It is possible to use the function of the front and rear position lamps to fulfil the requirements of end-outline marker lamps where there are obvious problems to make a separate installation. No additional end-outline marker lamps will be installed.	We consider it to be possible to fulfil both functions with the same lamp, both functions shall be fulfilled with an ECE R7 approved lamp.
	B	It shall always be additional end-outline marker lamps for all trailers over 2.10 m.	

Solution:
Although some Member States agreed with Swedish position, most of them considered B as the right solution. Further more Commission pointed out that there are end-outline marker lamps just to fulfil the directive.

5.25 Lateral protection (89/297 EC) Netherlands 4

Question:

Directive	:	89/297/EEC
Subject	:	Lateral Protection (Side guard)

Annex	:	Annex 3
Paragraph	:	3.1.
Point	:	3.1.

Text	:	An extendible trailer shall comply with all of the requirements of point 2, when closed to its minimum length; when the trailer is extended, the side guards shall comply with points 2.6., 2.7. and 2.8. and with either 2.4. or 2.5. but not necessarily both; extension of the trailer shall not produce gaps in the length of the side guards.

Question	:	Is there a difference between an extendible trailer and a trailer with movable axles-group.

Suggestion	:	adjust the definition of extendible trailer: a trailer with an extendible platform or with movable axle group.

Solution:
This question was withdrawn from the agenda of the meeting

5.26 Bus and coaches classes (2001/85 EC) Netherlands 1

Question:

Directive	:	2001/85/EC and 70/156/EEC
Subject	:	bus and coach classes

Annex	:	2001/85/EC, Annex I respectively 70/156/EEC, Annex II
Paragraph	:	2.1.1. B.2
Point	:	

Text :

2001/85/EC, Annex I

2.1.1. For vehicles having a capacity exceeding 22 passengers in addition to the driver, there are three classes of vehicles:

2.1.1.1. Class I: vehicles constructed with areas for standing passengers, to allow frequent passenger movement;

2.1.1.2. Class II: vehicles constructed principally for the carriage of seated passengers, and designed to allow the carriage of standing passengers in the gangway and/or in an area which does not exceed the space provided for two double seats;

2.1.1.3. Class III: vehicles constructed exclusively for the carriage of seated passengers.

A vehicle may be regarded as belonging in more than one Class. In such a case it may be approved for each Class to which it corresponds;

70/156/EEC, Annex II

B. DEFINITION OF VEHICLE TYPE

1. ……

2. For the purpose of categories M2 and M3:

A type shall consist of vehicles which do not differ in at least the following essential respects:

- the manufacturer,
- the manufacturer's type designation,
- category,
- essential aspects of construction and design:
- chassis/self-supporting body, single-/double deck, rigid/articulated (obvious and fundamental differences),
- number of axles,
- power plant (internal combustion/electric/hybrid).

Variant of a type means vehicles within a type which do not differ in at least the following essential respects:

- class as defined in Directive 2001/…/EC “Buses and coaches” (only for complete vehicles),
- extent of build (e.g. complete/incomplete),
- power plant:
  - working principle (as in point 3.2.1.1 of Annex III),
  - number and arrangement of cylinders,
  - power differences of more than 50 % (the highest is more than 1,5 times the lowest),
  - capacity differences of more than 50 % (the highest is more than 1,5 times the lowest),
  - location (front, mid, rear)
- technically permissible maximum laden mass differences of more than 20 % (the highest is more than 1,2 times the lowest),
- powered axles (number, position, interconnection),
- steered axles (number and position).

Version of a variant means vehicles, which consist of a combination of items shown in the information package subject to the requirements in Annex VIII.

Question	:	The bus and coach directive recognises that a vehicle can belong to more than one class, but it isn't clear whether the definition of a variant according directive 2001/116/EEC permits such a combination in one variant.

Suggestion	:	As Directive 2001/85/EC permits the possibility that a vehicle belongs to two classes and in order to register and use such a vehicle for those classes, a combination of bus classes can be regarded to belong to the same variant. The Certificate of Conformity of such complete or completed vehicles can indicate under point 37 a combination of "type of body".

Solution:

Most of the Member States showed no experience in this matter. Few of them accept to have class I or class II in the same variant but the Commission pointed out that each variant could only represent class

5.27 Controls of powered operated lifts Netherlands 3

Question:

Directive	:	2001/85/EC
Subject	:	Controls of power operated lifts

Annex	:	VII
Paragraph	:	3.11.4.4
Point	:	

Text	:	3.11.4.4. Operation of power-operated ramps. 3.11.4.4.1. Where the ramp is at a service door situated within the direct field of vision of the driver of the vehicle, the ramp may be operated by the driver when in the driver's seat. 3.11.4.4.2. In all others cases, the controls shall be adjacent to the ramp. They shall be capable of being activated and deactivated only by the driver from his seat.

Question	:	Paragraph 3.11.4.4. prescribes the following sequence of actions in cases where the driver has no direct view on the ramp and a wheelchair passengers is leaving a bus: 1. the driver stops the bus and activates the controle for the ramp; 2. the wheelchair passenger presses the controle for deploying the ramp 3. the wheelchair passenger leaves the bus 4 the wheelchair user presses the controle for folding the ramp and 5. after folding in the ramp the driver deactivates the control. Basic assumption of this requirement is that the driver doesn't leave his seat as many transport companies are forbidding the driver to do so. However in the case that a wheelchair use forgets action 4 above the driver will be forced to leave his seat, as the control for the ramp shall be adjacent to the ramp. Does paragraph 3.11.4.4.2 forbid an additional control for the driver to fold up a ramp in cases where a wheelchair passenger that has left the bus has forgotten to press the control for folding the ramp?

Suggestion	:	As GRSG is preparing an amendment to the equivalent paragraph of R107 we suggest that untill that amendment an additional controle for the driver is permitted, provided that he has view on the ramp by means of mirrors or camera-monitor systems.

Solution:
Some Member States agreed but some others disagreed because if the wording of directive does not allow, then is forbidden. It was suggested the use of an article 8.2.c. as a fast solution until the legislation can be changed

6. Items relating to framework directive 92/61 EC and 2002/24 EC (motorcycles)

6.1 Classification of vehicle Finland 2

Question:

REFERENCES (DIRECTIVE / ANNEX / ETC):

Directive 2002/24, CHAPTER I,
Article 1:
"3. This Directive shall also apply to quadricycles, i.e. motor vehicles with four wheels having the following characteristics:
(a) light quadricycles whose unladen mass is not more than 350 kg (category L6e), …….
(b) quadricycles, other than those referred to in (a), whose unladen mass is not more than 400 kg (category L7e) (550 kg for vehicles intended for carrying goods)……."

Directive 93/93 , ANNEX
1.5. unladen mass
means the mass of vehicle ready for normal use and equipped as follows:
- additional equipment required solely for the normal use under consideration,
- complete electrical equipment, including the lighting an light-signalling devices supplied by the manufacturer,
- instruments and devices required by the laws under which the unladen mass of the vehicle has been measured,
- the appropriate amounts of liquids in order to ensure the proper operation of all parts of the vehicle.
NB: the fuel and the fuel/oil mixture are not included in the measurement, but components such as the battery acid, the hydraulic fluid, the coolant and the engine oil must be included;

QUESTION / PROBLEM /CONCERN:

What should be done if the unladen mass of the vehicle is more than 350 kg for L6e or 400 kg for L7e? The unladen mass is stated on many Type approval documents to be 349 kg for L6e or 399 kg for L7e. If the vehicle is weighed (in other words: the weight of the vehicle is measured) it is not possible to have results below the weight limits. So the vehicle should be considered to be approved according to 70/156/EEC, but since the vehicle does not fulfil the requirements of 70/156/EEC it can not be approved. What should be done to correct this problem?

3. According to Article 10 the issuing authority should be informed if the vehicle does not conform to the type that has been type approved. The authority may request the Member State which has conducted the type-approval or component type-approval to verify the irregularities found.

4. Article 12 should be applied. If a Member State finds that vehicles, separate technical units or components constitute a road safety hazard, even though they are of a type which has been type-approved or component type-approved, it may, for a maximum period of six months, prohibit on its territory the sale, entry into service or use thereof. It shall forthwith inform the other Member States and the Commission, giving reasons for its decision.

5. Nothing. The approval is valid as it is. The Technical service has done the necessary tests and measurements.

Solution:
It seems to be difficult to measure the unladen mass in prototypes for the member state which does the approval and the only information that could be used for all member states is the running order mass according to COC document. However most of the Member States agreed that this is a question of conformity of production and that if anything is wrong the authority which granted the approval should be informed.

6.2 Location of the statutory plate and VIN Finland 3

Question:

REFERENCES (DIRECTIVE / ANNEX / ETC):

Directive 2002/24/EC, ANNEX IV EC CERTIFICATE OF CONFORMITY

0.6 Location of the statutory plate ([4]):
Vehicle identification number:

07. Location of the vehicle identification number on the chassis ([4]):

Footnotes
(4) Indicate the location by following codes:
R. right side of the vehicle
C: centre of the vehicle
L: left side of the vehicle
x: horizontal distance (in mm) from the frontmost axle (preceded by.¯. if in front of the front axle)
y: horizontal distance (in mm) from the longitudinal centre line of the vehicle
z: distance (in mm) from the ground
(r/o): parts need to be removed or opened to access to the marking. Example for a VIN plate fitted on the right side of a
motorcycle headpipe, 500 mm behind the front axle, 30 mm from the centre-line and 1 100 mm high:
R, x500, y30, z1100
Example for a VIN plate fitted to a quadricycle, on the right side of the vehicle, 100 mm in front of the front axle, 950 mm from
the longitudinal centre line of the vehicle and 700 mm high, under the bonnet:
R, x-100, y950, z700 (r/o)

QUESTION / PROBLEM /CONCERN:
Location of the plate and the identification number should be described in the approval document, in the information document and on the CoC as text, as coordinates or as a picture.
a) If the locations are different in the text and in the picture, which ones are right?

6. The locations in the picture are right.
7. The locations in the text are right.

b) There are cases, where “a model CoC-document” with location codes (coordinates) is attached to the approval documents, but these codes are not applied on the approval document. Can the location codes of “the model CoC” be used?

a. No, they can not be used. The CoC is only an example. The locations should be taken from the text and the picture.
b. Yes, they can.

Solution:

General agreement in both questions. The first one identifies a mistake that should be corrected by manufacturer / member state which granted the approval. In the second one is agreed that if there is an inconsistency it should be repaired and if there are different possibilities they should be stated in WVTA.

6.3 Stands for two-wheel motor vehicles (93/31 EC) Netherlands 7

Question:

Directive	:	93/31/EEC
Subject	:	stands for two-wheel motor vehicles

Annex	:	
Paragraph	:	3.1.1.3.2.
Point	:	

Text	:	"when the vehicle moves forward as a result of deliberate action by the driver following the first contact of the prop stand with the ground". *In August 2004, a correction was published, deleting the text: "following the* first contact of the prop stand with the ground".

Question	:	- How do other Type Approval Authorities and Test bodies handle this issue; does in the opinion of anybody present, the corrected text constitute a different approach on the technical requirements to prop stands, or is it simply done to eliminate potential confusion that a stand must first contact the ground prior to retracting ? - As this correction was done through the corrigendum process, can this change be interpreted to indicate already approved stands (or future stands of a similar design) are no longer acceptable following the new wording ?

Suggestion	:	This correction was made to bring the English text in line with the original French text of the document, and therefore did not intend any technical changes to be required to prop stand designs. If the results of the correction require technical changes, an amendment rather than a correction would have been the appropriate procedure. The amendment would include a date of entry into force, articles that include dates from when the new wording would be effective for new and existing vehicle types, and a date when COC's become invalid unless approved according to the latest amendment. RDW's recommendation is to continue approving similar designs to the ones already approved under the former wording and to ask the Commission for a formal confirmation on this issue.

Solution:

The problem is to establish if this correction is just editorial or if it does mean changes in requirements. The meeting agreed that under the revised wording it would not be possible to approve a vehicle with a prop stand that retracted on first contact with the ground <u>after</u> the vehicle has moved forward. However existing approvals granted using the old wording of the directive should still remain valid.

6.4 Revision vs extension in 2002/24 EC UK 5

Question:

IS IT ACCEPTABLE TO ISSUE A 'REVISION' TO A VEHICLE APPROVED IN ACCORDANCE WITH 2002/24/EC, OR MUST ALL AMENDMENTS ISSUED BE EXTENSIONS ?

ISSUE

The motor vehicle framework directive – 70/156/EEC gives express provisions to permit Approval Authorities to issue revisions / index pages to approvals in Article 5. This is less onerous than issuing an 'extension'.
The motorcycle framework directive, does not refer to index pages or extensions in the corresponding section, Article 9.

70/156/EEC

Article 5 - Amendments to type-approvals

4. In the case of vehicle type-approval, if particulars appearing in the information package have changed, the approval authority of the Member State in question shall issue revised page(s) of the information package as necessary, marking each revised page to show clearly the nature of the change and the date of re-issue; a consolidated, updated version of the information package accompanied by a detailed description of the change shall also be deemed to meet this requirement.
On any occasion when revised pages or a consolidated, updated version are issued, the index to the information package (which is attached to the approval certificate) shall also be amended to show the latest dates of revised pages or the date of the consolidated, updated version.
If, in addition, either further inspections are required or any information on the approval certificate (excluding its attachments) has changed or the requirements of any of the separate Directives applicable to the date from which first entry into service is prohibited have changed since the date currently on the vehicle approval, the amendment shall be designated as 'extension' and the approval authority of the Member State in question shall issue a revised approval certificate (denoted by an extension number) which shall show clearly the reason for extension and the date of re-issue.
If the approval authority of the Member State in question finds that an amendment to an information package warrants fresh inspections, it shall inform the manufacturer thereof and issue the documents mentioned in the first, second and third subparagraphs only after the conduct of successful fresh inspections. Any revised document shall be sent to all other approval authorities within one month.

2002/24

Article 9

1. The manufacturer shall be responsible for the manufacture of each vehicle or the production of each system, separate technical unit or component in compliance with the approved type. The final cessation of production or any changes to the information contained in the information document must be notified by the type-approval holder to the competent authorities in the Member State which issued that type-approval.
2. If the competent authorities of the Member State referred to in paragraph 1 consider that a change of this type does not involve any change to the existing type-approval certificate, or the drawing up of a new type-approval certificate, they shall inform the manufacturer accordingly.
3. If the competent authorities in the Member State referred to in paragraph 1 confirm that a change in the information set out in the information document justifies new checks or new tests, they shall inform the manufacturer accordingly and shall perform those tests. Should the checks or tests involve amendments to the existing type-approval certificate or the drawing up of a new certificate, the authorities shall inform the competent authorities of the other Member States in accordance with Article 6.
4. Where the particulars appearing in the information document for vehicle approval have changed, the manufacturer shall issue revised pages to the approval authority showing clearly

the nature of the change and the date of re-issue. Only where the changes made to the information document necessitate the amendment of one or more of the entries given in the certificate of conformity in Annex IV (except items 19.1 and 45 to 51 inclusive), shall the reference number on the information document be changed.

TAAM DISCUSSION

Possibilities of solution			Comments
	A	Yes : It is acceptable to issue only an index revision for a 2002/24 approved vehicle, the extension level does not need to increase	
	B	No : It is not acceptable to issue only an index revision. The approval must be extended and that extension level should be shown on the approval certificate.	

Solution:
Since 2002/24 does not include a revision procedure every modification requires an extension but there was a general agreement with solution A. Revisions are supposed to be done when there are very little changes or editorial ones. If there are changes in Annex VIII or new variants/versions an extension might be needed.

6.5 Snow scooters Poland 3

Question:

BACKGROUND
These vehicles are definitely outside of the scope of viehicle type-approval, however their construction and use is in many aspects similar to road vehicles.

Question:
Poland would appreciate the other countries assistance / opinion concerning national safety and enviromental requirements used in certification process of the above mentioned vehicles.

Solution:
These vehicles are clearly out of the scope of the directive but some delegates made their contribution to help the authority involved in the question.

6.6 Parking brake (93/14 EC) Germany 2

Question:

Issue
The directive 93/14/EEC requires the following construction for the parking braking:

2.1.2.3. Parking brake (if fitted)
The parking brake must make it possible to halt the vehicle stationary on up or down gradient even in the absence of the driver, the working parts being then held in the locked position by a purely mechanical device. The driver must be able to achieve this braking action from his driving seat.

Problem:
The KBA was informed about a four-wheeler (approved according to directive 92/61/EC, L6e) which uses the pure hydraulic front brake as a parking brake. A clamping device holds the front brake handle in the braked position.

Prescription
Directive 93/14/EEC, Annex I, 2.1.2.3

Possibilities of solution			Comments
	A	The whole parking brake must work on a pure mechanical basis.	The requirement of the directive is really clear.
	B	.	

Solution:
All member states agreed that parking brake must be a purely mechanical device. Spain reported that there are some existing Spanish approvals for ATV's (quad-bikes) that had parking brakes with mechanical clamps on hydraulic controls because the Spanish text did not include the word 'purely'. Spain stated that, in future, it would follow the TAAM agreement.

6.7 Braking devices in cuadricycles Spain 1

Question:

Issue
Characteristics of braking devices in cuadricycles

Prescription
2.2.4. Every tricycle (L5e or L7e) must be equipped with:
2.2.4.1. a foot-controlled serviced braking device which operates on all wheels,

Possibilities of solution			Comments
	A	It's NOT possible to grant an approval (93/14) for ATV vehicles with a braking device where the pedal only control the rear axle, consequently the WVTA it's imposible	
	B	Yes it's possible to grant 93/14 and 2002/24 CE	
	C	In any case the prescriptions of minImun deceleration when the pedal is operated must be 5.0 m/sg2 which corresponded to combined brake system.	

Comment

In the directive 2002/24 (Scope and definitions) the Art 1 . 3.b define :Cuadricycles …….These vehicles shall be considered to be motor tricycles and shall fulfil the technical requirements applicable to motor tricycles of category L5e unless specified differently in any of the separate Directives.

Solution:
Most of the Member States agreed that a full-controlled brake must operate on all wheels. Regarding prescriptions of minimum deceleration in the pedal, the meeting could not reach a common position.

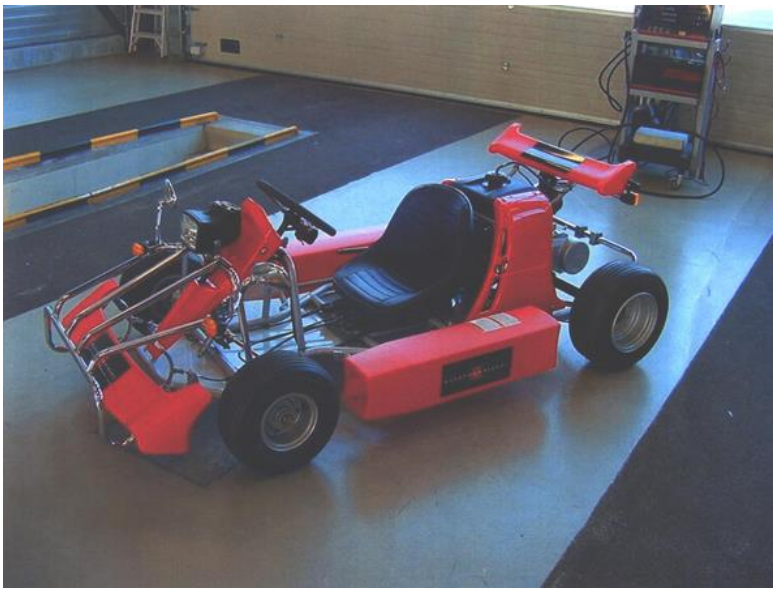
6.8 Vehicle suitable for use on roads? Sweden 3, Netherlands 6 and Commission 2

Question:

Type-approval of quadricycles according to Directive 2002/24/EC

According to our information the motor vehicle below has been type-approved as a quadricycle according to Directive 2002/24/EC

The Commission services would like to get the views of the TAAM members if this vehicle fulfils all requirements in order to be used on public roads.



Solution:
General feeling that these vehicles are unsafe and must not circulate on public roads but the problem is that there are some Member States that find difficulties in forbidding the registration of a vehicle with a WVTA. It was decided to create a working group which will collect all possible ideas and deal with this question (even considering how to change the framework directive).

7. Items relating to framework directive 74/150 EC (agricultural and forestry tractors)

7.1 Agricultural tractors (74/150 EC) Finland 4

Question:

Vehicle Administration is not the type approval authority for 74/150/EEC in Finland, but it has been brought to our knowledge that, EC type-approved tractors in one Member State are not allowed to pull a trailer or a trailed farm machinery without national certification in that Member State. In order to get this national certification, a tractor must undergo one day's tests carried out by a testing centre of this Member State.
Are other TAAM-members aware of that procedure?
Is this kind of national requirement legitimate in addition to the EC type-approval?

COUNTRY PROPOSAL / SUGGESTION:
Additional national certificates cannot be required.

Solution:
Some member states have several problems since long time ago with one specific Member State so some of them think they need to go further. It is pointed out that the way of starting official procedure is through the Commission so they will wait for official communications.

7.2 Safety belts for tractors Germany 1, Luxembourg 1 and Commission 1

Question:

Framework Directive 2003/37/EC for the type-approval of agricultural and forestry tractors will become mandatory from 1 July this year. Annex II, Chapter B, Part I contains a list with all requirements to be fulfilled for the purpose of EC type-approval. Regarding seat-belt attachment points the directive obliges manufacturers to comply with the requirements of Directive 76/115/EEC for cars, buses and trucks.

The European association of tractor manufacturers (CEMA) now claims that this requirement cannot be fulfilled and requests that the above mentioned reference to Directive 76/115/EEC is either deleted or replaced by a reference to an ISO standard through the procedure for adaptation to technical progress. CEMA argues as follows:

- The reference to Directive 76/115/EEC has been put in erroneously.
- Because of its construction a tractor cannot fulfil the requirements for cars, buses or trucks. Tractors are usually equipped with suspended seats with a low seat back which would make the fitting of three point belts impossible.
- The requirements for tractors should be less demanding as for other motor vehicles because tractors travel with a lower speed.

Several Member States have indicated that the appropriate solution would be to mandate anchorages for a lap belt instead of three-point seat-belts. Moreover, if the requirement is maintained it might not be possible to grant vehicle approvals, both for technical and legal reasons, the main ones being:

- the requirements for tractor seats are different than those for trucks.
- the scope of the directive currently does not cover tractors
- the directive contains different provisions for different categories of vehicles. Therefore it should be indicated for each tractor category which provisions would apply. From a technical point of view this should be in principle the ones for trucks, but this option should be clarified.

If it is concluded that Directive 76/115/EEC cannot apply to tractors, then a legal solution must be found. This solution shall take into account the present structure and principles in Directive 2003/37/EC.

The Commission would like to get the views of the TAAM on this issue.

Solution:
Although this is a very tricky question all member states agreed in that 1st of July is a very close date. However nothing similar to an approximation of agreement was reached because there are a lot of shades in it, specially considering different categories of agricultural tractors.

8. Miscellaneous

8.1 Slovenia 1

Question:

1 What is the practice with **used vehicles** – **produced in Europe for USA market and now imported from USA and Canada**:
- which parts or systems should be changed or modified on the vehicle, to be suitable for registration in EU?
- is it enough an individual approval of so modified vehicle in one EU country also for registration in other EU countries?
- what is the case if such modified vehicle is registered for one day in Italy? Are than any problems with registration in other EU countries?

2 What is the practice with **veteran cars:**
- which conditions should fulfil a vehicle for granting a status as veteran car?
- is this valid for serial production vehicles only?
- for replica cars which date shall be considered for granting a veteran car status – the date of replica production or the date of the original model?

3 What is the practice with **truck side walls** KLIPFIXX from 4media (Austria) for advertising. Vehicle equipped with this system in wider than 2.55 mm (for approx. 30 mm).
- how do you treat such vehicles in your country?

Solution:
Questions 1 & 2: The meeting noted that these questions were related to national registration requirements.
Question 3: The meeting agreed that for type approval the vehicle width would include all bodywork fixtures. In-use requirements might vary from country to country.
It was agreed that it would be better to handle these questions as an email enquiry outside the meeting

8.2 Tyre Installation: Type and Variant – Spain 5

Question:

Directive: 92/23/EC

Subject: Type and Variant Designation

Issue
According to the 92/23/EC information folder, each manufacturer presents for approval each one of their types, specifying variants, maximum speed, maximum axle load and tyres proposed for each variant.

The approval authority verifies if the proposed tyres are compatible with each variant characteristics, and in this case grants the approval.

Current Example:

Trade Mark	Type	Variants	Max Speed	Max Axle Load	Tyres
Manufacturer A	Model A	1.6	195	780	185/65R15 195/55R16 205/45R17
		2.0	210	850	205/60R16 225/45R17
		3.2	245	870	225/45R17 245/40R18

In latest time, it appears some manufacturers propose trying to receive a 92/23/EC approval according to the following scheme:

Proposed Example:

Trade Mark	Type	Variants	Speed Index	Load Index
Manufacturer A	Model A	135/70R13	S	60
		135/65R13	S	55
		145/70R13	S	65
		165/65R13	T	75
		And we follow until the end of the Michelin, Continental and Bridgestone tyre lists…		
		335/35R19	W	100
		345/30R20	W	100
		365/30R20	W	100

The Technical Service must verify that the list is correct.

According to this proposal, a manufacturer may receive only one 92/23/EC approval valid for all their current and future production.

When is the manufacturer going to request for an extension? Only if Michelin, Continental… introduce new tyres on their lists.

REMARK: If this procedure is accepted we simply should eliminate 92/23/EC and instead we should use the tyre manufacturers' lists

SPANISH PROPOSAL: All European Authorities should refuse an information folder as the proposed example.

Solution:
There was unanimous support for the Spanish opinion

9. Next meetings (Q4 2005) – Location to be established

Sweden kindly proposed to host the subsequent meeting in Q4 2005