

**TYPE APPROVAL AUTHORITIES MEETING
5TH & 6TH April, 2006 – Dublin, Ireland.**

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MEETING MINUTES

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Attendees:

Austria

Belgium

Bulgaria

Estonia

European Commission

Finland

France

Germany

Hungary

Iceland

Ireland

Italy

Latvia

Luxembourg

Netherlands

Norway

Poland

Spain

Sweden

Switzerland

United Kingdom

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AGENDA

1. Opening of the meeting

2. Adoption of the Agenda

3. Adoption of the minutes from Borlänge 27th & 28th September, 2006

4. Follow up on actions from the Borlänge meeting

4.1 **72/245/EC*2004/104/EC**: EMC and light installation – Germany 4 (Borlänge item 6.9)

4.2 **93/93/EEC**: Installation of lighting – Netherlands 1 (Borlänge item 7.3)

5. General items

5.1 TAAM Quadricycle Task Force - Identify those delegates interested in forming the task force. The task force will meet on 6 April - immediately after the main TAAM.

6. Items relating to framework directive 70/156/EEC (motor vehicles)

6.1 **2004/104/EEC**: EMC – Netherlands 1

6.2 **2005/66/EG**: Frontal protection system (bull bars) – Netherlands 2

6.3 **2005/66/EC**: Frontal Protection Systems; Interpretation of Annex I Paragraph 2.1.6 – UK 2

6.4 **2005/66**: Frontal Protection Systems; Definition of Frontal Protection Systems – UK 3

6.5 **2005/66/EC**: Frontal Protection Systems – Sweden 1

6.6 **2005/66/EC**: Frontal Protection Systems -Germany 3

6.7 **80/1268/EEC**: The measurement of carbon dioxide emissions and fuel consumption – Netherlands 3

6.8 **70/156/EEC**: End of series limits (Annex XII) – European Commission 1

6.9 **97/27/EC**: Overall length of a drawbar trailer and a centre-axle trailer – European Commission 2

6.10 **97/27/EC**: Exclusion of lifting platforms projecting from the overall length of a vehicle – European Commission 3

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- 6.11 **96/79/EC**: Establish according to which directive vehicles whose maximum weight mass exceeds 2.5 tonnes are tested – European Commission 4
 - 6.12 **70/156/EEC**: Single Vehicle Approval – European Commission 5
 - 6.13 **78/548/EEC**: Heating systems for motor vehicles and their trailers – Luxembourg 2
 - 6.14 **96/27/EC**: Side Impact. Opening doors after impact – UK 5
 - 6.15 **2004/104/EC**: – EMC – Sweden 2
 - 6.16 **2001/56/EC**: Heating Systems – Sweden 3
 - 6.17 **70/156/EEC**: – Labelling of systems WVTA – Germany 1
 - 6.18 **2001/56/EC**: Heating Systems – Germany 2
 - 6.19 **70/156/EEC**: Exceptions for special purpose vehicles according to Annex XI – Germany 5
 - 6.20 **2005/55/EC**: Repeal of Directive 88/77/EEC – Germany 6
 - 6.21 **2001/116/EC**: Type of Bodywork – Finland 1
 - 6.22 **70/156/EEC & 70/220EEC**: Fuel – Finland 3
 - 6.23 **2001/85/EEC**: relating to special provisions for vehicles used for the carriage of passengers - Luxembourg 1
 - 6.24 **2001/85/EC**: Single or double decked vehicles – France 1
 - 6.25 **2001/85/EC**: Single or double decked vehicles – France 2
 - 6.26 **70/156**: Archiving documents – France 3
 - 6.27 **2003/102/EC**: Pedestrian Protection – Italy 1
- 7. Items relating to framework directive 92/61/EEC and 2002/24/EC (motor cycles)**
- 7.1 **2002/24/EC**: Scope of the Directive – UK 4
 - 7.2 **2002/24/EC**: Pocket Bikes – Germany 4
- 8. Items relating to framework directive 74/150/EEC (agricultural and forestry tractors)**

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8.1 **2003/37/EC**: Definition of version – Finland 2

8.2 **2003/37/EC**: Agricultural Tractors – Italy 2

9. Miscellaneous

9.1 Information regarding test results from durability tests on used vehicles (evaporation – results for vehicles using petrol with 5% ethanol) – Sweden 3

9.2 **R115** – Scope and type criteria and families – Germany 7

10. Next meeting (Q2 2006) – Location to be established

11. Close Main TAAM

12. TAAM Quadricycle Task Force

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Meeting Minutes

1. Opening of the Meeting

Mr. Simon Kelly, CEO of NSAI, welcomed the meeting delegates.

2. Adoption of the Agenda

There was one addition to the agenda – Item 9.3 ETAES overview.

3. Adoption of the minutes from Borlänge 27th & 28th September, 2006

The minutes of the Borlänge TAAM were adopted after it was updated by Germany that they had issued a correction to item 6.6.

Sweden agreed to re-issue the Borlänge TAAM minutes.

4. Follow up on actions from the Borlänge meeting

4.1 72/245/EC*2004/104/EC: EMC and light installation – Germany 4 (Borlänge item 6.9)

Question: Components with valid 95/54/EC approvals are still allowed to be incorporated in 2004/104/EC vehicle approvals (starting 1.1.2006)?

The member states agreed on Solution B: Component approvals granted according to 95/54/EC are **not** valid to be incorporated in a 2004/104/EC vehicle approval.

4.2 93/93/EEC: Installation of lighting – Netherlands 1 (Borlänge item 7.3)

Question is withdrawn.

5. General items

5.1 TAAM Quadricycle Task Force - Identify those delegates interested in forming the task force. The task force will meet on 6 April - immediately after the main TAAM.

All were in favour of the task force and the majority of the attendees where able to participate.

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6. Items relating to framework directive 70/156/EEC (motor vehicles)

6.1 2004/104/EEC: EMC

Annex VI - Method of testing for immunity of vehicles to electromagnetic radiation.
The technical service shall perform the test at the intervals specified in ISO DIS 11451-1:2003 throughout the frequency range 20 to 2000 MHz.
Alternatively, if the manufacturer provides measurement to data for the whole frequency band from a test laboratory accredited to the applicable parts of ISO 17025 (1st edition 1999) and recognised by the Approval Authority, the technical service may choose a reduced number of spot frequencies in the range, e.g. 27, 45, 65, 90, 120, 150, 190, 230, 280, 380, 450, 600, 750, 900, 1300, and 1800 MHz to confirm that the vehicle meets the requirements of this Annex.
If a vehicle fails the test defined in this Annex, it must be verified as having failed under the relevant test conditions and not as a result of the generation of uncontrolled fields.
Consider the following situation:
A manufacturer has its own test laboratory. This test laboratory is accredited to ISO17025 and recognised by the Approval Authority (for EMC).
The manufacturer provides measurement data for the whole frequency band from his test laboratory to the Technical Service. This enables the Technical Service to follow the alternative procedure given in point 3.1.1. to perform spot checks instead of the entire test to confirm that the vehicle meets the requirements.

Question:
We would like to know if in your opinion this an acceptable situation?

Decision: Technical Service approval is independent of manufacturer, but it was made clear that it was Technical Services responsibility to be satisfied with manufacturer. If necessary must carryout additional tests.

6.2 2005/66/EG: Frontal protection system (bull bars)

Annex I - Technical provisions
2.1.6. At any lateral position across the vehicle, in order to preserve the benefits of the vehicle bumper, the longitudinal distance between the most forward part of the bumper and the most forward part of the frontal protection system shall not exceed 50 mm.
The Directive states in point 2.1.6. that the maximum distance between the most forward part of the front protection system and the most forward part of the bumper can be no more than 50 mm.
Please note that the Directive mentions parts and not points!
The Directive refers to the most forward *part* of the frontal protection system (FPS) and the most forward part of the bumper. The most forward part of the bumper is specified in point 1.5. but the most forward part of the FPS is not specified. The most forward part of the FPS can therefore be a horizontal or vertical (tubular) section as depicted in the drawing (the hatched section of the FPS). The distance between the two parts (FPS and bumper) is depicted in the drawing as d_{max} .

Questions:
-Do you agree that the d_{max} in the drawing is the correct measured distance (max. 50 mm) as referred to in point 2.1.6.?

-If you do not agree, how is in your opinion the distance measured according the requirements of point 2.1.6.?

Decision: D-Max is correct measured distance. Directive needs to be clarified. (Commission)

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6.3 2005/66/EC: Frontal Protection Systems;

Interpretation of Annex I Paragraph 2.1.6

Background

VCA would like to seek the views of the other TAAM members regarding alternative interpretations of 2005/66/EC Annex 1 Paragraph 2.1.6

TAAM DISCUSSION

Part One

Paragraph 2.1.6 provides some dimensional constraints on the position of the frontal protective system in relation to the vehicle's front bumper in order to 'preserve the benefits of the vehicle bumper'. Paragraphs 2.1.7 and 2.1.9 ensure that, when a frontal protective system is fitted, the bumper and other protection systems still provide the designed protection to the occupants in a crash and that the vehicle's performance in relation to other EC Type Approval subjects is also not compromised.

The current Paragraph 2.1.6 wording 'the longitudinal distance between the most forward part of the bumper and the most forward part of the frontal protection system shall not exceed 50 mm.' could be interpreted two ways because the words 'forward part' could be considered to mean either:

A) The most forward 'position' or 'point' on the bumper and the most forward 'position' or 'point' on the frontal protection system

Or

B) The most forward '**component**' of the bumper and the most forward '**component**' of the frontal protection system

Interpretation 'A' would mean that, in some instances, there would be a restriction on the thickness of cladding that could be fitted to the protection device – thereby restricting the opportunities for reducing pedestrian injuries.

However, if 'part' can be read to mean 'component', then interpretation 'B' could be applied to allow a maximum 50 mm 'separation' distance (i.e. gap) between the foremost component of the frontal protection system and the foremost component of the bumper. This would not then restrict the opportunities for manufacturers to maximise the padding, and would thereby potentially increase benefits to pedestrians.

Possibilities of solution

A: The front of the protection system must not be more than 50mm in front of the bumper

B: The gap between the bumper and the most forward part (i.e. component) of the protection system

Part Two

Section 2.1.6 states that the 50 mm dimension must be applicable at any lateral position across the vehicle. VCA interprets this to mean only Solution C is Possible but would like to hear the views of the other TAAM delegates.

Possibilities of solution

C: The 50mm dimension applies at all positions across the full width of the front bumper

D: The 50mm dimension only applies between the single most forward point of the front bumper and the single most forward point of the frontal protection system

Decision: Member states and commission agreed on Solution C

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6.4 **2005/66:** Frontal Protection Systems; Definition of Frontal Protection Systems

The legislation covering Frontal Protection Systems (2005/66/EC) applies to all M1 vehicles up to 3.5 tonnes and all N1 vehicles.

The problem is that, for some components designed to be fitted to the fronts of these vehicles, it can be difficult to distinguish between add-on body styling panels and a Frontal Protection System.

TAAM DISCUSSION

The key question is, using the definition in Annex I paragraph 1.7, is it possible differentiate between a frontal protective system and a body styling panel?

It is accepted that this issue will involve case by case judgement for which due consideration must be given to the construction and mounting arrangements of the component in addition to its appearance and intended function.

The purpose of this paper is therefore to seek the opinions of the other TAAM members in order to agree some practical working guidelines.

Possibilities of solution

A: Any add-on component fitted to the front of a vehicle should be considered **to be a Frontal Protection System**

B: It is possible to differentiate between alternative styling panels and Frontal Protection systems.

Front mounted components would normally only be considered to be Frontal Protection Systems if they have all the following characteristics:

- Available as an add-on factory/dealer option or as after-market accessory
- Separate structure attached to the front of the vehicle
- Securely mounted on a substantial part of the vehicle structure (e.g. bumper subframe, chassis longitudinals etc)
- Designed to absorb impacts to prevent damage to underlying vehicle bodywork

C: Any other interpretation/guidelines agreed at the TAAM

Decision: Any add-on components fitted which is intended to protect the front of a vehicle should be considered to be a Frontal Protection System, including additional functions, headlights etc.

Solution A

6.5 **2005/66/EC:** Frontal Protection Systems

DIRECTIVE 2005/66/EC Annex 1, paragraph 1.7

**frontal protection system* ' means a separate structure or structures, such as a bull bar or a supplementary bumper, which is intended to protect the external surface of the vehicle, above and/or below the original equipment bumper, from damage in the event of a collision with an object. Structures, with a maximum mass of less than 0,5 kg, intended to protect only the lights, are excluded from this definition;

QUESTION / PROBLEM /CONCERN:

Is a holder for extra lights considered as a frontal projection system or is it excluded by the definition in the directive, (the intention to protect the external surface)?

What can be considered as a holder?

A: Holders for extra lights are not included

B: Holders for extra lights are included

Decision: See 6.4

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6.6 **2005/66/EC**: Frontal Protection Systems

Issue

Annex I paragraph 2.1.6 of the new directive for frontal protection systems (FPS) says: At any lateral position across the vehicle, in order to preserve the benefits of the vehicle bumper, the longitudinal distance between the most forward part of the bumper and the most forward part of the frontal protection system shall not exceed 50 mm.

Does this mean that the 50mm is valid for any point of the FPS, especially the really most forward point of the FPS? Or will the value allow e.g. a longitudinal distance between the most forward part of the bumper and a tube with 80mm diameter? (See drawing)

Only when the FPS has got some room to reduce the crash energy it is suitable to protect the pedestrian. If not answer A is the solution, there will be no more FPS on the market (e.g. today's diameter of the tubes are about 80mm). The drawings in the commission decision (proposal already agreed in the CATP!) show always FPS with a distance to the car/bumper.

Possibilities of solution

A: The distance between the FPS and the bumper as shown in the drawing on top is meant.

B: The distance between the most forward point of the FPS and the bumper as shown in the drawing on the bottom is meant.

Decision: See 6.4

6.7 **80/1268/EEC**: The measurement of carbon dioxide emissions and fuel consumption

Annex I - Determination of CO₂ emissions and fuel consumption

Before the test, the vehicle must be stored in a room where the temperature remains between 293 and 303 K (20 and 30 °C). This conditioning period will last at least six hours and to a point where the temperature of the engine lube oil and the engine coolant are within ± 2 K of the room temperature. At the request of the manufacturer, the test may be conducted within a maximum of 30 hours after the vehicle has been used at normal temperature.

The above mentioned text describes what we call the soak time of the vehicle.

What if a vehicle is equipped with a heat energy storage system? This heat energy storage system consists of an insulated container in which part of the engine coolant is stored when the engine is stopped. This warm coolant is fed back into the engine the next time the engine is started and the engine warms up more quickly with all the added advantages of better fuel economy and lower emissions.

Question: What soak time must be used for the fuel consumption test in case the engine is equipped with such a heat storage system? F

For the fuel consumption tests of vehicles equipped with an engine with a heat energy storage system a soak time of at least 12 hours must be used. This represents the average soak time of a vehicle in normal daily use.

Explanation:

During Madrid TAAM meeting on 9 and 10 March 2005 it was confirmed that engines equipped with a heat storage system can be covered by emission Directive 70/220/EEC. However the remark was made that the worst case condition must be used during the emission test procedure.

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If this is also applied for the measurement of the carbon dioxide emissions and the fuel consumption of vehicles equipped with a heat storage system it can be expected that the longest soak time is worst case condition and that the soak time has to be extended to 30 or 36 hours. The engine coolant stored in the heat storage system will be cold after that long a soak time and the advantages of the system are nullified.

The soak time we propose reflects the average soak time during daily use and as a result the introduction of energy saving systems will be encouraged.

Decision: The commission made the point, we cannot always change directive with new technology, find solutions with current wording.

6.8 70/156/EEC: End of series limits (Annex XII)

Enquiry amongst the Member States to establish how provisions regarding end-of-series are applied.

Current text

B.END-OF-SERIES LIMITS (ANNEX XII) 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 M1, 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.

Issue

The Commission considers that the choice has been taken by the Member States when transposing the Directive into national law. This is certainly the case with regard to vehicles belonging to category M₁. However, for vehicles of other category than M₁, the end-of-series procedure as prescribed in the Directive is not compulsory (see Article 8(2)b for reference). Therefore, the Commission would like to know the situation in this respect and in particular which specific event in Annex XII has been chosen if any.

Decision: Most member states used both options. The commission's view was that one option to be used. The wording was ambiguous and can lead to the use of 2 options.

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6.9 **97/27/EC**: Overall length of a drawbar trailer and a centre-axle trailer

Overall length of a drawbar trailer and of a centre-axle trailer.

Current text

2.4.1. 'Vehicle length' is a dimension which is measured according to ISO standard 612 : 1978, term 6.1.

2.4.2.

[Standard ISO 612 : 1978

6.1.1. (motor vehicle) distance between two vertical planes perpendicular to the longitudinal median plane (of the vehicle) and touching the front and rear of the vehicle respectively. (All parts of the vehicle, including any parts projecting from front or rear (towing-hooks, bumpers, etc.) are contained between these two planes°.

6.1.2. (trailer) as above. However, the length without 'drawgear' is being placed in parentheses. (To determine the length with 'drawgear', the drawbar is assumed to be located so that the axis of the drawbar eye or coupling head is vertical and lies within the foremost vertical plane).

[97/27/EC]

In addition to the provisions of that standard, when measuring the vehicle length the following devices must not be taken into account [see the list]

Issue

Industry has informed the Commission's services that it has noticed different interpretations with respect to the definition of the length of a trailer. It also put in question the fact that some Member States are still applying national definitions for the purpose of national approval, which differ from the provisions of Directive 97/27/EC.

The length of a vehicle is strictly limited in the European Union by Directive 96/53/EC and Directive 97/27/EC. Therefore, it is important to specify how the length of the vehicle should be measured.

In accordance with Annex I of Directive 2001/116/EC, vehicle dimensions relate to overall length of a vehicle, therefore the drawbar should be included in the overall length in the case of a trailer. Because of the overall length of a combination is also strictly limited, trailer manufacturers propose in practice several optional drawbar lengths; therefore, it is not always easy to define what is the maximum length of the trailer.

Proposal

The Commission is proposing not to change the text of the Directive, which is clear and should not pose any problem. However it acknowledges that some practical aspects with respect to type-approval need to be solved.

It is proposed that both dimensions (with and without drawbar) should be mentioned in the file to be submitted for the purpose of type-approval.

Decision: The Commission is proposing not to change the text of the Directive, which is clear and should not pose any problem. However it is proposed that both dimensions (with and without drawbar) should be mentioned in the file to be submitted for the purpose of type approval. A number of Member States are currently doing this.

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6.10 **97/27/EC:** Exclusion of lifting platforms projecting from the overall length of a vehicle

2.4.1. 'Vehicle length' is a dimension, which is measured according to ISO Standard 612: 1978, term 6.1.

In addition to the provisions of that standard, when measuring the vehicle length the following devices must not be taken into account

- [...]
- lifting platform, access ramps and similar equipment in running order, not exceeding 300 mm, provided that the loading capacity of the vehicle is not increased,
- [...]

Issue

The length of a vehicle is strictly limited in the European Union due to application of Directive 96/53/EC on national and international traffic (mandatory) and Directive 97/27/EC on masses and dimensions (still optional).

According to Industry, different interpretations exist on whether to include or not a tolerance of 300 mm in the measurement of the overall length of a vehicle in case of fitting of a lifting platform. Different interpretations in this field could lead to infringe the European legislation.

Proposal

DG Enterprise is suggesting that, in the case of a lifting platform, projections up to a maximum of 300 mm are permitted and do not interfere with the permitted overall length of the vehicle: a 12.30 m vehicle will be regarded as a 12.00 m.

When the lifting platform exceeds 300 mm, then the lifting platform will be considered as part of the overall length of the vehicle and the resulting overall dimension must comply either with the provisions of point 1.1. of Annex I of Directive 96/53/EC in the case of a motor vehicle or a trailer or with the provisions of point 1.8. of Annex I in the case of a semi-trailer.

Decision: There was majority support for the Commission's proposal.

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6.11 **96/79/EC:** Establish according to which directive vehicles whose maximum weight mass exceeds 2.5 tonnes are tested

Current text

1. SCOPE

1.1. This Directive applies to power-driven vehicles of category M1 of a total permissible mass not exceeding 2,5 tonnes, with the exception of multistage built vehicles produced in quantities not exceeding those fixed for a small series; **heavier** vehicles and multi-stage built vehicles **may** be approved at the request of the manufacturer.

Issue

The Commission considers that the manufacturer may choose between Directive 96/79/EC (off-set test impact) and 74/297/EEC (full impact) when the maximum technically permissible mass of the vehicle exceeds 2.5 tonnes.

Given the concept of the chassis (unit body or separate frame), one test method could be considered as more appropriate than the other. Therefore, some guidelines might have been laid down by the type-approval authorities.

The Commission would like to know the practical situation in the Member States and in particular how many types of vehicle continue to be type-approved in accordance with the test method prescribed in Directive 74/297/EEC.

Decision: The member states who granted these approvals pointed out that it was the Manufacturers choice. This was also the conclusion at the last TAAM. No change of opinion.

6.12 **70/156/EEC:** Single Vehicle Approval

Current text

Article 1 of Directive 70/156/EEC

SCOPE

This Directive applies to the type-approval of [...]

It does not apply to the approval of single vehicles except that member states granting such approvals shall accept any valid system, component, separate technical units or incomplete vehicle approval granted under this Directive instead of the relevant national requirement.

Issue

The Commission services are of the opinion that an Individual Approval Scheme ('IAS') is necessary to bring some flexibility in the EC Whole Vehicle Type-Approval. However, they consider that licence cannot continue to be given to Member States to manage such approvals through their national legislation, because of the completion of the internal market. Therefore, an Individual Approval Scheme has been included in the scope of the proposed recast framework

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Directive, currently under consideration by the European Institutions. Once adopted, the EC 'IAS' will replace progressively the SVA system in use in the MMSS.

The Commission services strongly believe that 'IAS' scheme may not be used for the approval of vehicles produced in series (even in small series). In addition, several Members of the European Parliament have made strong reservations about the fact that the Community legislation could be circumvented by using requirements which are lower than those required by the approval directives. Therefore, it is nearly certain that amendments in this line with this standpoint will be tabled by the EP Committee during the second reading process.

In the meantime, the Commission services are proposing:

- 1) a moratorium that no approval will continue to be granted by MMSS to vehicles produced in series (even in small series) until the framework directive is amended;
- 2) to set up a working group under chairmanship of the Commission to prepare specific requirements to deal with individual approvals.

Decision: Most member states interested in new working group. It was felt that this question is outside TAAM and belongs to CATP.

6.13 **78/548/EEC:** Heating systems for motor vehicles and their trailers

Directive 78/548/EEC relating to heating systems for motor vehicles and their trailers, amending Council Directive 70/156/EEC and repealing Council Directive 78/548/EEC

Directive 2001/56/EC, Annex VIII, item 1.1.6.21.

1.6.2 no uncontrolled release due to an accident can occur. Means shall be provided to stop the flow of LPG by installing a device directly after a cylinder or container mounted regulator or if the regulator is mounted remote from the cylinder or container, a device shall be installed directly before the hose or pipe from the cylinder or container and an additional device shall be installed after the regulator.

Question

Luxembourg delegation wants to know how to interpret the text sequence "due to an accident"?

Is it possible to issue a certificate according to Directive 2001/86/EC, Annex VIII, if item 1.1.6.2. of the Directive is only covered by a system who stops the flow of LPG only in case of a complete disconnection of the pipe.

Decision: Support Commission generally. Some member states where of the view testing should cover leakage. No performance criteria is mentioned in the directive for leakage. Sympathy towards adopting Geneva position.

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6.14 **96/27/EC: Side Impact. Opening doors after impact**

BACKGROUND

Whilst the Front Impact legislation (96/79/EC, as amended by 1999/98/EC) includes a requirement that no front door shall lock during the test, the Side Impact legislation (96/27/EC) only specifies that it must be possible to open sufficient number to allow evacuation of the occupants after the test and does not specifically mention the issue of doors locking.

ISSUE

During the 96/27/EC side impact test it is possible that the test vehicle's central locking might become activated for one of the following reasons:

- Inertia effects on the components of the locking system
- Physical activation of the locking system components due to distortion of the vehicle structure
- Contact between the dummy and the central locking control during the impact (i.e. if the central locking control is in an exposed location it could be operated by direct contact with the dummy)

Under the provisions of 96/27/EC Annex II Section 3.3, it would be acceptable for one (or more) of the doors to lock provided it is possible to still open sufficient number of the other doors to be able get the occupants out of the car - but what about a situation in which the central locking system is activated during the test? :

Possibilities of solution

A: The central locking must not be activated during a 96/27/EC side impact test Comments: If the central locking is activated during a 96/27/EC side impact test the vehicle does not meet the requirements of Annex II Section 3.3.2 because it would not be possible to open doors **without tools** after the impact.

B: It can be acceptable for a vehicle's central locking system to be activated during a 96/27/EC side impact test.. Comments: If the central locking is activated during a 96/27/EC side impact test the vehicle can be considered to meet the requirements of Annex II Section 3.3.2 provided, once unlocked, the required number of doors can then be opened without tools

Decision: While it was noted that Solution B was possible there was a majority consensus on Solution A.

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6.15 **2004/104/EC: – EMC**

Annex 1, paragraph 3.2.9

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 IIIC 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

QUESTION / PROBLEM /CONCERN:

The first part of the texts says that the declaration according to 89/336/EEC or 1999/EC (CE-marking) shall cover an additional statement that the equipment fulfils the limits according to 6.5, 6.6, 6.8 and 6.9 of Annex I of directive 2004/104/EC. To verify this, additional measurements have to be done. The second part says that the inspection shall not require any additional tests for determination if the equipment is immunity-related or not.

The question is - Further tests or not?

A: Full tests according to 6.5, 6.6, 6.8 and 6.9 of Annex I of directive 2004/104/EC have to be done.

B: No additional test has to be done, a technical judgement is enough to verify if the equipment is immunity-related or not

Decision: Some member states, stated if a device is not safety critical test is not compulsory, test doesn't have to be done. 1 member state felt testing must be done to 6.5 – 6.9.

TYPE APPROVAL AUTHORITIES MEETING
5TH & 6TH April, 2006 – Dublin, Ireland.

6.16 **2001/56/EC: Heating Systems**

DIRECTIVE 2004/78/EC ANNEX VIII, article 1 and article 2.
SAFETY REQUIREMENTS FOR LPG COMBUSTION HEATERS AND LPG HEATING SYSTEMS

1. LPG HEATING SYSTEMS FOR ROAD USE

1.1. If an LPG heating system in a motor vehicle can also be used when the vehicle is in motion, the LPG combustion heater and its supply system shall comply with the following requirements:

1.1.1. The LPG combustion heater shall comply with the requirements of the harmonised standard on specifications for dedicated LPG appliances – Room sealed LPG space heating equipment for installation in vehicles and boats (EN 624:2000) (*).

1.1.2. In cases of a permanently installed LPG container all components of the system that are in contact with LPG in the liquid phase (all components from the filling unit to the vaporiser/pressure regulator) and the associated liquid phase installation shall comply with the technical requirements of UN/ECE Regulation No. 67-01, Part I and II and the Annexes 3 to 10, 13 and 15 to 17(**).

1.1.3 The gaseous phase installation of the LPG heating system in a vehicle shall comply with the requirements of the harmonised standard on specifications for the Installation of LPG systems for habitation purposes in leisure accommodation vehicles and in other road vehicles (EN 1949:2002) (***).....

2. LPG HEATING SYSTEMS FOR STATIONARY USE ONLY

The LPG-combustion heater and its supply system of an LPG heating system that is intended to be used only when the vehicle is not in motion, shall comply with the following requirements:

2.1.1. Permanent labels shall be attached on the compartment where the portable LPG cylinders are stored and in close proximity to the control device for the heating system, giving instructions that the LPG heater shall not be in operation and that the valve of the portable LPG cylinder shall be closed when the vehicle is in motion.

2.1.2. The LPG combustion heater shall comply with the requirements of section 1.1.1.

2.1.3. The gaseous phase installation of the LPG heating system shall comply with the requirements of section 1.1.3.

QUESTION / PROBLEM / CONCERN:

Is article 2 applicable for caravans? (LPG HEATING SYSTEMS FOR STATIONARY USE ONLY) The caravan should have a permanent marking that the LPG heater shall not be in operation and that the valve of the portable LPG cylinder shall be closed when the vehicle is in motion Can article 1 be accepted for caravans even though paragraph 1.1 says for motor vehicle?

A: The caravans shall have marking according to article 2 if the heater is intended for stationary use only.

B: Article 2 is not intended for heaters in caravans. The directive is only applicable for motor caravans.

C: A caravan can fulfil the requirements in article 1 even though the requirements is primary intended for motor vehicles

Decision: Solution A was accepted.

TYPE APPROVAL AUTHORITIES MEETING
5TH & 6TH April, 2006 – Dublin, Ireland.

6.17 **70/156/EEC:** – Labelling of systems WVTA

<p><u>Issue</u></p> <p>There are more and more system and unit approvals under the 1958 agreement which are used in WVTA:</p> <p>UNECE-Regulations refer in their provisions of obligatory labelling of the approved system (such as R13 or R79). The question is, why do the manufacturer need to label the system on a car which has a valid WVTA. All the needed information is already written down in the approval document and information document. In the future there will be more and more EC-WVTA containing UNECE approvals. New technologies are mostly approved under the 1958 agreement and labelling is an unnecessary burden to the approval holder.</p> <p>How do other authorities deal with this issue?</p> <p><u>Possibilities of solution</u></p> <p>A: There is no need to label systems, which are approved under the 1958 agreement (e.g. R13 or R79)</p> <p>B: Labelling is still needed as described in the different UNECE Regulations</p>

Decision: Solution B agreed, but following alternative views were expressed, is labelling not required if marketed in EU, but must be made clear to manufacturers labelling must appear if outside EU. Framework directive needs to be amended to make clear the labelling requirements.

6.18 **2001/56/EC:** Heating Systems

<p><u>Issue</u></p> <p>The directive 2001/56/EC allows to approve separate technical units and vehicles with regard to their heating systems. Often different heating units do have already different approvals regarding the type definition criteria. Once the vehicle manufacturer applies for an approval regarding its heating systems he uses already approved components with different approval numbers. The distinction between the different types of heating system is already done together with the component/unit approval, so in our opinion the is only one system approval for the car needed instead of dividing the vehicle approval regarding its heating system into up to possible 6 or more approvals.</p> <p><u>Possibilities of solution</u></p> <p>A: If there are already different unit/parts approvals for the different heating types, there is no need to separate the vehicle approvals regarding the heating system into several types and approvals</p> <p>B: The type criteria leads to the procedure to make e.g. out of 3 unit approvals additional 6/9 or 12 possible system approvals.</p>
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Decision: Solution A agreed.

TYPE APPROVAL AUTHORITIES MEETING
5TH & 6TH April, 2006 – Dublin, Ireland.

6.19 **70/156/EEC:** Exceptions for special purpose vehicles according to Annex XI

Issue

Annex XI defines the applicable directives and the deviations from this directives for type approval of special purpose vehicles depending on their use.

For different Directives the following explanation of the letter G is applicable: Requirements according to the category of the base/incomplete vehicle (the chassis of which was used to built the special purpose vehicle). In the case of incomplete/completed vehicles, it is acceptable that the requirements for vehicles of the corresponding category N (based on maximum mass) are satisfied. The applicants are uncertain if the exception is applicable for special purpose vehicles build up on base/incomplete vehicles of category M.

Provisions: Directive 70/156/EEC article 1 (1) and Annex XI

Possibilities of solution:

A: The applicability of the exceptions for special purpose vehicles depends not on the category of the base vehicle. It is possible to use the exceptions for vehicles build up on a N chassis and for vehicles of category M, approved in one or multi stages.

Comment: The division of the explanation to letter G shows clearly, that the exceptions are applicable for e.g. in a single step approved special purpose vehicles, too.

B: The exception is only applicable for vehicles build up on a base vehicle of category N.

Comment: This is an unequal treatment of in the end similar vehicles.

Decision: Change required to new framework directive.

6.20 **2005/55/EC:** Repeal of Directive 88/77/EEC

Issue:

The new Directive 2005/55/EC together with the implementation Directive 2005/78/EC is a recast of Directive 88/77/EEC. The Directive 88/77/EEC is repealed with effect from 9 November 2006.

The question is, if the provisions of the Directive 88/77/EEC after the 9th of November are still applicable:

1. Are approvals according to Directive 88/77/EEC (Row B1) furthermore valid and how long?
2. Are extensions of approvals on the basis of Directive 88/77/EEC after the 9th November possible?

Provisions: Directives 2005/55/EC and 2005/78/EC

Decision: 1. Yes until 08 November 2006.

2. No.

TYPE APPROVAL AUTHORITIES MEETING
5TH & 6TH April, 2006 – Dublin, Ireland.

6.21 **2001/116/EC: Type of Bodywork**

Directive 2001/116/EC, Annex II, (same wording as in 98/14/EC)

C, DEFINITION OF TYPE OF BODYWORK

The type of bodywork in Annex I, Annex III, Part 1, point 9.1 and in Annex IX, point 37 shall be indicated by the following codification:

1. Passenger cars (M1)

AA Saloon, AB Hatchback Saloon, AC Station wagon, AD Coupé, AE Convertible, AF Multi-purpose vehicle

QUESTION / PROBLEM / CONCERN:

Is it allowed to use for passenger cars (M1) definitions that describe the type of bodywork other than the above mentioned AA –AF? (Roadster, Monocoque etc.)

Possible Solutions:

1. No, the wording of the directive forbids this.

2. Yes.

Decision: The Member States and Commission agreed with Solution 1, to use definitions as they are defined in the directive.

It was felt that if new definitions were required these would need to be addressed through the Commission.

6.22 **70/156/EEC & 70/220EEC: Fuel**

Directive 2001/116/EC, Annex I, 3.2.2

“Fuel: diesel oil/petrol/LPG/NG/ethanol”

QUESTION / PROBLEM / CONCERN:

How should the “environmental friendly” fuels be considered in the Type Approval? The emission directive 70/220/EEC with its amendments covers only the traditional fuels, but not ethanol or mixtures with it.

Should ethanol and all kinds of fuel mixtures with it be mentioned in 2001/116/EC, Annex I, section 3.2.2?

If the fuels not covered by 70/220/EEC are used, what kind of requirements should be used?

Decision: There was a lot of discussion on the above topic and the conclusion reached was that Vehicles cannot get type approval with Ethanol.

It was asked if the Commission can take note that many manufacturers are working towards LPG and Fuel Cell but at present it is not possible to grant type approval.

TYPE APPROVAL AUTHORITIES MEETING
5TH & 6TH April, 2006 – Dublin, Ireland.

6.23 **2001/85/EEC**: relating to special provisions for vehicles used for the carriage of passengers

Directive 2001/85/EC relating to special provisions for vehicles used for the carriage of passengers comprising more than eight seats in addition to the driver's seat, and amending Directives 70/156/EEC and 97/27/EC

Directive 2001/85/EC, Annex 1, item 7.6.7.6

7. 6. 7. 6. All emergency doors shall be provided with an audible device to warn the driver when they are not securely closed. The warning device shall be operated by movement of the door catch or handle and not by movement of the door itself.

Regulation 52R01 EEC item 5.6.7.6.

5. 6. 7. 6. All emergency doors, which cannot easily be seen from the driver's seat, shall be provided with an audible device to warn the driver when they are not securely closed. The warning device shall be operated by the movement of the door catch and not by the movement of the door itself.

Question?

Luxembourg delegation wants to know how to interpret the difference between Directive 2001/85/EC item 7.6.7.6 and Regulation 52R01 item 5.6.7.6.

Is it possible to issue a certificate according to Directive 2001/85/EC for busses of class A and B, if the information document points out that the drivers door, defined as an emergency door, is not equipped with an audible warning device, but an reference is given to Regulation 52R01 item 5.6.7.6.

Decision: Yes, it is possible to grant a certificate according to directive 2001/85/EC for buses of class A and B if it fits into item 7.6.1.7.3 of 2001/85/EC.

TYPE APPROVAL AUTHORITIES MEETING
5TH & 6TH April, 2006 – Dublin, Ireland.

6.24 2001/85/EC: Single or double decked vehicles

Issue

Single or double-decked vehicles of Class M2 and M3 are built today without roof over all or part of its deck.

The TRANS/WP.29/GRSG/2005/21 draft amendments to ECE regulation No. 107 supported by Spain precise the kind of prescriptions that could be specified in the case of vehicle without roof. For example: space for standing passengers, driver and passenger protection (continuous front panel over the full width of that part of the vehicle that does not have a roof, protection around the side and rear of that part of the vehicle that does not have a roof, vision and communication passengers in the area without a roof, etc...).

Could it be possible to deliver a 2001/85/EC type approval for M2, M3 without roof?

Prescription: No specific prescription at this time in 2001/85 for M2, M3 without roof.

Possibilities of solution:

A: No, we wait the 107R02 validation (and only national prescriptions for the moment).

B: Yes, we apply only the 2001/85/EC prescriptions.

Comments: Some prescriptions are incompatible with the roof absence (standing passenger surface, exits, etc...)

Decision: Member States agreed on Solution B

6.25 2001/85/EC: Single or double decked vehicles

Issue

Is it possible to consider a M2 or M3 vehicle having a capacity exceeding 22 passengers in addition to the driver as a class II when:

- The vehicle is designed to requirements concerning the carriage of standing passengers,
- The vehicle couldn't be use to carry standing passengers (for example: vehicle without roof),
- The total passengers number is equivalent to the standing passengers number (no standing passengers declared),

Prescriptions:

For vehicles having a capacity exceeding 22 passengers in addition to the driver, 2001/85/EC define three classes of vehicles:

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

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;

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

Possibilities of solution:

A: No, The vehicle must be considered as a class III.

B: Yes

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Decision: Member States agreed on Solution A. The vehicle must be considered, as a Class III if standing is not declared.

6.26 70/156: Archiving documents

Issue

In Directive 70/156/EEC, there is no prescription about the storage of EC Type Approvals. How do other authorities deal with archiving?

A: What documents do we have to store?

the Communication Form, the Information Document, Technical report, all the documents?

B: How long?

Decision: Different member states are adopting different solutions. In general all documentation is being stored infinitely.

TYPE APPROVAL AUTHORITIES MEETING
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6.27 **2003/102/EC**: Pedestrian Protection

Enquiry amongst the Member States to establish how provisions regarding pedestrian protection on vehicle type approved before October 2005 are applied.

Current text

Article 2

Paragraph 2 shall not apply to vehicles which do not differ with respect to their essential aspects of bodywork construction and design forward of the A pillars from vehicle types which have been granted EC type-approval or national type-approval before 1 October 2005 and which have not already been approved under this Directive.

Annex 1

Technical provisions

2.7 Vehicle Type' means a category of vehicles which, forward of the A-pillars, do not differ in such essential respects as:

- the structure,
- the main dimensions,
- the materials of the outer surfaces of the vehicle,
- the component arrangement (external or internal), insofar as they may be considered to have a negative effect on the results of the impact tests prescribed in this Directive;

Issue

The current text considers that it is up to the technical service to decide whether or not a vehicle type not complying to pedestrian protection, (type approved before October 2005) has to be tested when it has been subjected to a face lifting.

The uncertain definition of “essential respects” or “essential aspects of bodywork” disrupt design of future vehicles and give a subjective responsibility to the technical service.

Therefore, the Italian Ministry of Transport would like to know whether a vehicle type, approved before October 2005, would continue to be exempted by Pedestrian Protection provisions regardless to any changes carried out later on components such as: bumper, grill, mud guards, bonnet and headlamps. Namely those parts that are not essential aspects of bodywork. **(OPTION A)**

Or ,

A vehicle type, approved before October 2005, would continue to be exempted by Pedestrian Protection provisions, if any changes carried out subsequently on components (such as: bumper, grill, mud guards, bonnet and headlamps, namely that are not essential aspects of bodywork) do not worse the previous situation. The comparison between the former and the new situation can be demonstrated by computer simulation. **(OPTION B)**

Decision: Member States agreed on Option A.

Most member states interpreted that this must be decided on a case-by-case basis.

TYPE APPROVAL AUTHORITIES MEETING
5TH & 6TH April, 2006 – Dublin, Ireland.

7 Items relating to framework directive 92/61/EEC and 2002/24/EC (motor cycles)

7.1 2002/24/EC: Scope of the Directive

Article 1 defines the applicability of this framework directive :

This Directive applies to all two or three-wheel motor vehicles, whether twin-wheeled or otherwise, intended to travel on the road, and to the components or separate technical units of such vehicles.

The directive does not say that tracked vehicles, such as that shown above are within the scope of the directive. Article 1 goes on to exempt certain types of vehicles, such as vehicles designed primarily for off-road leisure use having wheels arranged symmetrically with one wheel at the front of the vehicle and two at the rear. The above vehicle may be primarily for off road use, but the manufacturer claims there is no reason why it could not be used on the road.

Our first intention was to say that the vehicle falls outside of the scope, based on the reasoning that it is not propelled on wheels, could not comply with the requirements of chapter 1 – tyres, and a number of other chapters / SDs.

However, when looking at the model information document, there is the following:

1. General arrangement of the vehicle
 - 1.1. Photos and/or drawings of a typical vehicle:
 - 1.2. Dimensional drawing of the complete vehicle:
 - 1.2.1 Wheelbase:
 - 1.3. Number of axles and wheels (where appropriate, number of crawler tracks or belts):

Possibilities of solution:

A: The vehicle is outside the scope of the directive

B: Because of the wording in the information document, the commission had considered that tracked vehicles could fall within the scope of the directive. The vehicle is exempt from certain chapters due to the lack of tyres.

Decision: Commission agreed on Solution A.

The Commission will address the directive and correct wording if needed.

Additional note: Snow scooters do not fall under the scope of directive 2002/24/EC.

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5TH & 6TH April, 2006 – Dublin, Ireland.

7.2 2002/24/EC: Pocket Bikes

Issue

There are a lot of new types of vehicles, so called pocket bikes, entering the EU-market. On several exhibitions these vehicles are presented for sale. Some of them do have a WVTA (medium size) some don't (smaller size).

The vehicles which have a valid WVTA do fulfil the requirements of all separate directives mentioned in the framework directive 2002/24/EC. Although this is the case, we think that those bikes are not safe on the roads and should not have the right to be driven on public roads. In Germany the WVTA for such a medium range pocket bike is of the category L1e and has got a v_{max} of 45km/h. So for Germany it is not possible to reject these bikes from being registered, because of the only obligation for those mopeds to have a valid insurance (small insurance number plate).

The KBA would like to add this issue to the discussion about changing the directive 2002/24/EC in its scope

(Working group to be held on Thursday afternoon after the TAAM).

Decision: No discussion at general TAAM. This issue was raised at the Quadricycle Working group who met on Thursday afternoon after the TAAM.

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8 Items relating to framework directive 74/150/EEC (agricultural and forestry tractors)

8.1 2003/37/EC: Definition of version

REFERENCES (DIRECTIVE / ANNEX / ETC): 2003/37/EC, Annex II, Chapter A:
‘version’ of a variant means tractors which consist of a combination of items shown in the information package in accordance with Annex I.”

QUESTION / PROBLEM / CONCERN:

If information document includes several components for which there are multiple entries, the number of versions can become impractically large. In addition, technical differences between versions may be very small. Is this considered as problem in other Member States?

PROPOSAL/SUGGESTION:

It should be defined such technically minor multiple entries in information document, which can be included in one version. These minor differences would not affect to vehicle masses, outer dimensions, noise results, or exhaust emissions.

Decision: *This is not considered a problem with other member states who grant approval to this directive.*

Most member states agreed that all versions/variants are to be added.

8.2 2003/37/EC: Agricultural Tractors – Italy 2

Directive 2003/37/EC requires that the Approval Authority shall fill in the type approval certificate (see Annex II, Chapter C, Part I) including as an annex the test results of Annex II, Chapter C, Part II. Among the test results smoke opacity is requested (m^{-1}) This specific data can be measures according to Directive 2003/37/EC.

Directive 77/537/CEE:

- is not anymore in the list of requirements for the purposes of vehicle EC type-approval (Annex II chapter B, Part I and Appendix I, part II and
- has not been repealed so far;

The above situation creates some confusion among approval authorities since on one hand they might not require a certification according to Directive 77/537/EEC but on the other hand a smoke opacity figure is requested in the type approval certificate.

Question: In order to grant an approval to agricultural tractors according to Directive 2003/37/EC:

Do you require a certification according to Directive 77/537/EC?

If not, do you insert smoke opacity figure in the approval certificate?

If yes, how?

Decision: *No agreement or solution was reached, to be followed up at next TAAM.*

Commission recommend that approvals without the smoke capacity value entered be accepted.

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9. Miscellaneous

9.1 Information regarding test results from durability tests on used vehicles (evaporation – results for vehicles using petrol with 5% ethanol) – Sweden 3
Contact Sweden directly if further details are required

9.2 **R115** – Scope and type criteria and families

Issue:

In the last amendment of R115 there is a scope reduced to newer vehicles fulfilling EURO 3 and 4 level.

Older vehicles are no longer in the scope. Is this only valid for the emission-testing, so a TAA could issue approvals only referring to the other provisions of R115 such as safety provisions? Otherwise this produces big problems!

Second problem arises watching the possible extension of the parent vehicle and tested vehicle (often 2 Test vehicles referring to $0.7 * P_{(parent)} \leq P \leq 1.15 * P_{(Parent)}$ Do the tested vehicle needs to be in the above mentioned range? Or is it possible to choose Test-vehicles having much less respectively much more Power than the formula above?

This then will blow the amount of vehicles in the type or family up to nearly all types and also much manufacturers!

Decision:

- 1) *No overall conclusion was achieved. Some member states commented that they follow National guidelines with all obligations to R115.*
- 2) *Member states agreed to keep within the range stated.*

Polish experts are currently looking at this issue. Poland will issue results, which will be circulated and reviewed at the next TAAM, if available.

9.3 ETAES – KBA, Germany to distribute information to other member states.

10. Next meeting (Q2 2006) – Location to be established

We thank Austria for their invitation to host the TAAM in Q03 2006 in partnership with Hungary.

Provisionally planned for 28th and 29th September.

11. Close Main TAAM

12. TAAM Quadricycle Task Force

See separate minutes for TAAM Quadricycle Task force meeting, which took place on the afternoon of April 6th, 2006.

**TYPE APPROVAL AUTHORITIES MEETING
5TH & 6TH April, 2006 – Dublin, Ireland.**