KBA

TYPE APPROVAL AUTHORITIES MEETING

MEETING MINUTES

09 – 10 April 2008
Leipzig – Germany

Attendees:

Belgium

Bulgaria

Czech Republik

Estonia

Finland

France

Germany

Ireland

Italy

Luxembourg

Norway

Poland

Romania

Slovenia

Spain

Sweden

Switzerland

AGENDA

1. **Opening of the meeting**

2. **Adoption of the Agenda**

3. **Adoption of the minutes from Tallinn, 27 and 28 September 2007**

4. **Follow up on actions from the Tallinn meeting**
   - 4.1 Directive 2007/46/EC, Small series (Nat. and International), Germany 2
   - 4.2 (Tallinn 6.2), 70/156/EC, Extension vs. Revision in new Framework Directive, Spain1
   - 4.3 (Tallinn 6.5), Individual approval and national type approval of small series, report of findings, Finland 2
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   - 4.5 (Tallinn 7.10), External projections of bumper, Spain2
   - 4.6 (Tallinn 8.8), Dublin issue, Quadricycles subgroup – KOM, considered to have a MCWG
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   - 7.5 96/27/EC / ECE R 95.02, Acceptability of EUROSID 2, Netherlands 2
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   - 7.10 97/27*2001/85*2003/19/EC, Restricted area in the gangway (Buses class II), Romania 2
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7.15 71/320/EEC, Inertia braking systems of trailer (Definition G_A mass), France 1
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9. Items relating to framework directive 2003/37/EC (agricultural and forestry tractors)

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10.3 All Regulations, Revisions to information package of ECE approvals, Netherland 3
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11. Next meeting (Q3- 2008)

11.1 TAAM-Invitation from Bulgaria

12. Subgroup – Small series

MINUTES OF THE MEETING

1 OPENING OF THE MEETING

2 ADOPTION OF THE AGENDA

3 ADOPTION OF THE MINUTES FROM TALLIN, 27 AND 28 SEPTEMBER 2007

4 FOLLOW UP ON ACTIONS FROM THE TALLIN MEETING

4.1 Directive 2007/46/EC, Small series (Nat. and International), Germany 2

Issue:
In the last TAAM in Tallinn several TAA raised questions regarding the future 'real living' with the small series provisions, such as the footnotes A, B, C in the international small series and the comparable nat. provisions for Testing in the light of nat. small series.

Decision:
The installation of a sub-group is supported. The group will start after the official agenda of the TAAM. All members can volunteer.

4.2 (Tallinn 6.2), 70/156/EC, Extension vs. Revision in new Framework Directive, Spain 1

Legislation:
70/156 EC, Art. 5, paragraph 4:

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.

New Framework directive, Chapter V, article 14:

1. If particulars recorded in the information package have changed, the amendment shall be designated a "revision".

In such cases, the approval authority shall issue the revised page of the information package as necessary, marking each revised pages 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 changes, shall be deemed to meet this requirement.

2. The revision shall be designated an "extension" if, in addition to the provisions of paragraph 1:

(a) **further inspections or fresh tests** are required;

(b) any information on the EC type-approval certificate, with the exception of its attachments, has changed;

(c) new requirements under any of the regulatory acts applicable to the approved vehicle type enter into force.
In such cases, the approval authority shall issue a revised EC type-approval certificate denoted by an extension number, incremented in accordance with the number of successive extensions already granted.
The approval certificate shall show clearly the reason for the extension and the date of re-issue.

Question
In new framework directive one of the reasons for issuing an extension instead of a revision is “further inspections or fresh tests required”. We would like to know the understanding of other MS regarding the meaning of “fresh tests” when talking about vehicles type approval and if there is any difference in the intention of the new wording compared to the old one.

EXAMPLE FOR CLARIFICATION

One particular manufacturer wants to approve a new Model Year car and the only change it has from the previous model is the brake system. A new brake test is carried out and an extension for brakes system approval is issued. What about the WVTA? If we consider 2001/116 EC, because there are no new inspections needed under Annex 5, then a revision is permitted. Now, considering the wording of directive 2007/46, should the system approval test be consider as a “fresh test” and consequently an extension of WVTA (instead of revision) becomes mandatory?

Decision
An extension is necessary

4.3 (Tallinn 6.5), Individual approval and national type approval of small series, report of findings, Finland 2

Article 24
Individual approvals
1. Member States may exempt a particular vehicle, whether unique or not, from compliance with one or more of the provisions of this Directive or with one or more of the regulatory acts listed in Annex IV or Annex XI, provided that they impose alternative requirements.
The provisions referred to in subparagraph 1 shall only be waived where a Member State has reasonable grounds for so doing.
"Alternative requirements" means administrative provisions and technical requirements which aim to ensure a level of road safety and environmental protection, which is equivalent to the greatest extent practicable to the level provided for by the provisions of Annex IV or Annex XI, as appropriate.

Question/Problem/Conern

1. Have You considered some directives to which You are not going to impose alternative requirements according to article 24 in the framework directive (individual approvals) / article 23 national type approval of small series?

Decision
The question will be passed to the agenda of the small series sub-group.

4.4 (Tallinn 6.11/6.12), Small series – sub group, UK 2, Ireland 1

Background
The recast Framework Directive introduces an opportunity for European Small Series approval for M1 vehicles and the technical requirements are identified in the Appendix to Annex IV Part 1. For some subjects (typically the component approvals) a full European approval is required but for other subjects some derogation is permitted according to the following classifications:

X: Full compliance with regulatory act is required; EC type-approval certificate has to be issued; conformity of production shall be ensured.
A: No exemptions permitted except those specified in the regulatory act. Type-approval certificate and type-approval mark are not required. Test reports have to be established by a notified technical service.
B: The technical prescriptions of the regulatory act have to be fulfilled. The tests provided for in the regulatory act have to be performed in their entirety; subject to the agreement of the approval authority, they may be performed by the manufacturer himself; he may be allowed to issue the technical report; a type-approval certificate does not have to be issued and type-approval is not required.
C: The manufacturer has to demonstrate to the satisfaction of the approval authority that the essential requirements of the regulatory act are fulfilled.
N/A This regulatory act is not applicable (no requirements).

Issue
For subjects marked with classifications X, A and B the manufacturer must meet the full technical requirements of the respective and the difference between them is related to the amount of documentation and the amount of witnessed testing required.

However for Subjects marked with ‘C’ there is scope for different interpretations between Type Approval Authorities. It is clear that manufacturer’s test data can be accepted but is not clear which technical requirements need to be met.

The purpose of this paper is therefore to seek a common understanding of the words ‘essential requirements’ for each of the subjects concerned. Subjects marked with classification ‘C’ are:

- Steering Effort
- Door Latches & Hinges
- Radio Suppression
- Interior Fittings
- Protective Steering
- Seat Strength
- Exterior Projections
- Defrost Demist
- Wash/Wipe
- Heating Systems
- Engine Power
- Masses & Dimensions

Decision
The question will be passed to the agenda of the small series sub-group.

4.5 (Tallinn 7.10), External projections of bumper, Spain2

Issue: Minimum radius in external projections of bumpers

Background:
On the last TAAM in Estonia (Sept 2007) question 7.10 showed the problem of the definition of bumper with regard of its external projections. There was no consensus and now the question arises again.

In these two pictures a big difference can be appreciated.

Picture 1

Picture 2

The question now is that if we understand that metallic structure in picture 2 is situated below the plastic protection then requirement under paragraph 5.4 can be applied (2.5 mm) but if we consider the bumper exactly as it is the provisions under point 6.5 shall be considered (5 mm).

Legislation: Point 6.5 of Annex 1 directive 74/483 EC as last amended 2007/15 EC

Question:
Could the 2.5 mm requirement be applied for the bumper?

Decision:
The wording of the directive must be followed. If there is a bumper, you have to apply 5 mm. If there is no bumper to recognize, you can apply 2.5 mm. You can also define the bumper in accordance to rigid surfaces. All possibilities are accepted. The directive should be clearified by Commission.

4.6 (Tallinn 8.8), Dublin issue, Quadricycles subgroup – KOM, considered to have a MCWG

Background

The TAAM has previously discussed questions about quadricycles covered by the motorcycle framework directive. On each occasion the meeting has expressed concern about the safety of some of these vehicles on public roads – in particular quad bikes and 'go-karts'.

Whilst, it has been noted that individual Member States might be able to apply 2002/24/EC Article 4 section 6 (see also 70/156/EEC Article 4 Section 2) to prevent registration on a national basis, it is also generally accepted that if the quadricycles meet all the relevant legislative requirements it is difficult to refuse them an approval.

There has therefore been a consensus opinion at previous meetings that the legislation should be changed to restrict these types of vehicles.

The Commission is currently discussing the legislation covering quadricycles and has invited the TAAM to submit some proposals to support the discussion (see the minutes of the March 2005 TAAM held in Spain)

The TAAM sub-group acknowledged that its roll was not to propose actual legislation but simply to make some practical proposals/suggestions for motorcycle design criteria that could be used to support ongoing discussions in the Motor Cycle Working Group.

LEGISLATION

2002/24/EC

CHAPTER I - Scope and definitions

Article 1

1.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.

This Directive does not apply to the following vehicles:
(a) vehicles with a maximum design speed not exceeding 6 km/h;
(b) vehicles intended for pedestrian control;
(c) vehicles intended for use by the physically handicapped;
(d) vehicles intended for use in competition, on roads or in off-road conditions;
(e) vehicles already in use before the application date of Directive 92/61/EEC;
(f) tractors and machines, used for agricultural or similar purposes;
(g) 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;
(h) cycles with pedal assistance which are equipped with an auxiliary electric motor having a maximum continuous rated power of 0,25 kW, of which the output is progressively reduced and finally cut off as the vehicle reaches a speed of 25 km/h, or sooner, if the cyclist stops pedalling,
nor to the components or technical units thereof unless they are intended to be fitted to vehicles covered by this Directive.

It does not apply to the approval of single vehicles except that Member States granting such approvals shall accept any type-approval of components and separate technical units granted under this Directive instead of under the relevant national requirements.

2. The vehicles referred to in paragraph 1 shall be subdivided into:

(a) mopeds, i.e. two-wheel vehicles (category L1e) or three-wheel vehicles (category L2e) with a maximum design speed of not more than 45 km/h and characterised by:
(i) in the case of the two-wheel type, an engine whose:
— cylinder capacity does not exceed 50 cm^3 in the case of the internal combustion type, or
— maximum continuous rated power is no more than 4 kW in the case of an electric motor;
(ii) in the case of the three-wheel type, an engine whose:
— cylinder capacity does not exceed 50 cm^3 if of the spark (positive) ignition type, or
— maximum net power output does not exceed 4 kW in the case of other internal combustion engines, or
— maximum continuous rated power does not exceed 4 kW in the case of an electric motor;

(b) motorcycles, i.e. two-wheel vehicles without a sidecar (category L3e) or with a sidecar (category L4e), fitted with an engine having a cylinder capacity of more than 50 cm^3 if of the internal combustion type and/or having a maximum design speed of more than 45 km/h,

(c) motor tricycles, i.e. vehicles with three symmetrically arranged wheels (category L5e) fitted with an engine having a cylinder capacity of more than 50 cm^3 if of the internal combustion type and/or a maximum design speed of more than 45 km/h.

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), not including the mass of the batteries in case of electric vehicles, whose maximum design speed is not more than 45 km/h, and
(i) whose engine cylinder capacity does not exceed 50 cm^3 for spark (positive) ignition engines, or
(ii) whose maximum net power output does not exceed 4 kW in the case of other internal combustion engines, or
(iii) whose maximum continuous rated power does not exceed 4 kW in the case of an electric motor.

These vehicles shall fulfil the technical requirements applicable to three-wheel mopeds of category L2e unless specified differently in any of the separate directives;

(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), not including the mass of batteries in the case of electric vehicles, and whose maximum net engine power does not exceed 15 kW.

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.

PROPOSALS FROM MEETING

TAAM Sub-Group Proposals regarding Quadricycles Tricycles and Pocket Bikes

PART I: 4 AND 3 WHEEL VEHICLES

The view of the meeting was that Quadricycles and Tricycles should be considered in two distinct categories, namely:

- Those with saddles
- Those with seats

A: Vehicles with Saddles

Quadbikes

Design proposals to improve safety of vehicles to be approved for road use:

- Minimum track width [suggestion: 1000mm]
- Minimum Track/Wheelbase ratio [suggestion: wheelbase to be at least 1.2 times the track of the front and rear axles]
- Differential on all driving axles
- Only one seat (i.e. driver only – passengers not allowed)
- Must meet Anti-tampering requirements (to maintain restrictions on engine power/road-speed)
- Must be fitted with ‘e’ marked (or ‘E’ marked) tyres suitable for the vehicle use on public roads
- Must meet high speed stability test (e.g. ‘Elk’ test)
- Must meet wheel-guard requirements

Trikes (3 wheel bikes)

The meeting proposed that the following requirements should also be applied to motor tricycles (and three-wheel mopeds) with saddles:

- Minimum track width for two-wheel axle [suggestion: 1000mm]
- Minimum Track/Wheelbase ratio [suggestion: wheelbase to be at least 1.2 times the track of the two wheel axles]
- Differential on driving axles (if 2 wheels used for drive)
- Must meet Anti-tampering requirements (to maintain restrictions on engine power/road-speed)
- Must be fitted with ‘e’ marked (or ‘E’ marked) tyres suitable for the vehicle use on public roads
- Must meet high speed stability test (e.g. ‘Elk’ test)
- Must meet wheel-guard requirements

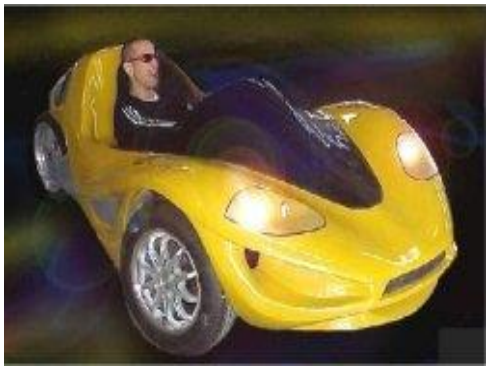
B: Vehicles with Seats

Design proposals to improve safety of vehicles to be approved for road use:

4 Wheel 'Microcars'

- Minimum 'R' point height for all seating positions [suggestion: 450mm]
- Passenger compartment to be fully enclosed with fully closed bodywork (with or without doors) up to a minimum height above R point [suggestion: 200mm above R point]
- Must meet seat belt and seat belt anchorage requirements
- Must be fitted with windscreen (with specific dimension requirements)
- Must meet wheel-guard requirements
- Must meet requirements for protection of fuel tank

3 Wheel cars



The meeting proposed that the following requirements should also be applied to 3 wheel cars (motor tricycles) with seats:

- Minimum 'R' point height for all seating positions [suggestion: 450mm]
- Passenger compartment to be fully enclosed with fully closed bodywork up to a minimum height above R point [suggestion: 200mm above R point]
- Must meet seat belt and seat belt anchorage requirements
- Must be fitted with windscreen (with specific dimension requirements)
- Must meet wheel-guard requirements
- Must meet requirements for protection of fuel tank

PART II: POCKET BIKES

Pocket Bikes fall under the provisions for two wheel bikes.

Design proposals to improve safety of 2 wheel vehicles to be approved for road use:

- Must have saddle
- Minimum Wheelbase [suggestion: 1000mm]
- Minimum Saddle height [suggestion: 550mm]
- Minimum Handlebar height [suggestion: 550mm]
- Minimum Handlebar width [suggestion: 500-550mm]
- Minimum dimension between centre of saddle and pivot point of handlebar [suggestion: 500-600mm]
- Minimum Road Wheel diameter [suggestion: 10 inches]

. COM is working on the two-wheelers framework directive. Next year there will be a proposal by commission, in Sep 2008 there will be MCWG, where this topic will be on the agenda.

4.7 (Tallinn 10.2) Contact for In-Use compliance, Authorities in Member State

Decision
The meaning of the issue was made clear again. Germany will initiate a query to ask for the competent bodies in the MS

5 GENERAL ITEMS

5.1 Attendance at TAAM by NTSEL Japan as Observers, UK 2

Background
VCA has been asked whether two delegates from the NTSEL of Japan (National Traffic Safety and Environment Laboratory) could attend a TAAM meeting as observers. The delegates would be:

Ikuo Nakatani , Deputy Director, Automobile Type Approval Test Department

Takashi Naono, Chief Engineer, Automobile Type Approval Test Department

Issue

It is not appropriate for the UK to invite observers unilaterally; this needs to be a collective TAAM decision.

TAAM does not, normally, accept observers, expect in anticipation of a country becoming an EC Member State.

However, it is difficult to decline a request from an official body that hopes to learn from the TAAM experience.

On the other hand, if we agree to NTSEL then we could receive requests from many other organisations.

The number of TAAM delegates must be controlled in order to make the organisation of meetings manageable for the host country. If observers are accepted, perhaps their invitation should be for one meeting only.

Decision
TAAM should be preserved just for the Type Approval Authorities of the EEA, Switzerland and the Commission. Canditate countries may be accepted.

6 ITEMS RELATING TO FRAMEWORK DIRECTIVE 2007/46/EC (MOTORVEHICLES)

6.1 2007/46/EC, (Framework Directive) Article 23 (Article 12), Belgium 1

Question :
In case a vehicle type is approved according to Article 23 (National type-approval of small series) it may be understood that the measures described in article 12 / Annex X are not necessary (it is not an EC-type approval).
If the manufacturer requests, the approval authority shall send a copy of the type-approval certificate and its attachments to the member state designated by the manufacturer.
How is it ensured to the member-state that accepts the approval, that the registered vehicles are conform the approved type ?

Issue:

Article 12 describes the measures to be taken in accordance with Annex X, by the memberstate that grants an EC type-approval to ensure that vehicles, systems, components or separate technical units are produced conform to the approved type.

Decision
There are no EU requirements for national small series approvals. Annex X is generally accepted. All beyond has to be clarified between the MS. The topic will be put on the sub-group agenda.

6.2 2007/46/EC, (Framework Directive) Article 23 (quantitative restrictions), Belgium 2

Question :
In case a type approval according to article 23 is accepted by another member-state, does it mean that vehicles can be registered under the same quantitative restrictions as in article 23 ? If yes, is this quantitative limit taken from the member-state that approved the type, or is the limit set by the member-state that accepts the approval.

Legislation :

Article 23 - National type-approval of small series :

…..

6. The validity of the type-approval shall be restricted to the territory of the Member State that granted the approval. However, if the manufacturer so requests, the approval authority shall send

by registered mail or by electronic mail a copy of the typeapproval certificate and its attachments to the approval authorities of the Member States designated by the manufacturer.

Decision
In each MS there can be accepted nmt 75 vehicles (depending on national transposition of the framework directive). But each MS has to grant a small series approval on its own.

6.3 2007/46/EC, Electric vehicles, European Commission 2

Two Member States have expressed concerns about two EC WVTA approvals granted to Chinese M_1 vehicles[1].

In one case, the position of the R point above the ground is questioned. In the second case, no type, variant or version have been created whilst advertising booklets show that different models are proposed.

The Commission would like to know whether other Member States have identified specific issues regarding those approvals.

Question No X (Directive 2007/46/EC)

By contrast to Directive 70/156/EEC, electric vehicles under Framework Directive 2007/46/EC will have to be granted EC whole vehicle type-approval before they may be put on the market as from 29 April 2009.

The Commission would like to know how the issue of certifying the power of electric motors has been tackled by the national approval authorities as no directive currently regulates it.

Decision
A system approval according to UNECE-R 85 for the vehicle manufacturer is demanded.

6.4 2007/46/EC, EC small-series approval, Sweden 4

Question/Problem/Concern:

Is it correct that an EC-type approval according to 78/316/EEC shall be required for an EC-small-series approval? (This is not mandatory for an EC WVTA)

		Yes	
		No	

Selection of solution			
1. Yes			
1. No			

[1] e4*2001/116*0133*00 and e3*2001*116*0266*00

Decision
According to the latest Commission proposal (version 10-website) it will be answer B. But a test report would be sufficient, too.

6.5 2007/46/EC, EC type-approval of vehicle intended for the transport of dangerous good, France 5

- ***Regulation numbers :***

- Directive 2007/46/EC establishing a framework relating to EC type-approval of vehicles
- Directive 98/91/EC relating to motor vehicles and their trailers intended for the transport of dangerous goods by road

Annex XI / Nature of and provisions for special purpose vehicles
APPENDIX 4 / Other special purpose vehicles (including trailer caravans)

- **Issue**
  Are vehicles intended for the transport of dangerous good considered as “other special purpose vehicles” ?

Decision
Judging vehicles as ADR or special purpose vehicles might be independent from each other. ADR vehicles can be SPV, but they need not necessarily. The definition of SPV is quite open.

6.6 2007/46/EC, Type approval for tanker vehicle, France 6

- ***Regulation numbers :***
  - Directive 2007/46/EC establishing a framework for the approval of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles
  - Directive 98/91/EC relating to motor vehicles and their trailers intended for the transport of dangerous goods by road
- Directive 94/55/EC amended 2006/89/EC
- ADR 2007

Annex I / Complete list of information for the purpose of EC type-approval of vehicles
0.4.1. Classification(s) according to the dangerous goods which the vehicle is intended to transport: 14. SPECIAL PROVISIONS FOR VEHICLES INTENDED FOR THE TRANSPORT OF DANGEROUS GOODS (directive 98/91/EC) [...]

Annex IV / List of requirements for the purpose of EC type-approval of vehicles

Part I / List of regulatory acts 56.vehicles intended for transport of dangerous good / 98/91/EC

Annex IX / EC certificate of conformity

For complete or completed vehicles of categories N1 , N2 and N3 39. Tank capacity (Tanker vehicle only): ... m 3 48.1. EC type-approved according to the design requirements for transporting dangerous goods: yes (classes): .../no (1)

- ***Text of Directive 98/91/EC***

Annex I / Scope, definition, classification, requirements

4. REQUIREMENTS

The requirements regarding the construction of vehicles intended for the carriage of dangerous goods by road, including the provisions for their type approval, where appropriate, laid down in marginals 220 500 to 220 540 of Annex B to Directive 94/55/EC, shall be fulfilled.

- ***Text of Directive 94/55/EC amended 2006/89/EC***

ANNEX A

Provisions of Annex A to the European Agreement on the international carriage of dangerous goods by road (ADR), as applicable with effect from 1 January 2007, it being understood that "contracting party" is replaced by "Member State". The text of the amendments of the 2007 version of Annex A to the ADR will be published as soon as it is available in all official languages of the Community.

ANNEX B

Provisions of Annex B to the European Agreement on the international carriage of dangerous goods by road (ADR), as applicable with effect from 1 January 2007, it being understood that "contracting party" is replaced by "Member State".

- ***Text of ADR 2007***

Annex B / Provisions concerning transport equipment and transport operations PART 9 / REQUIREMENTS CONCERNING THE CONSTRUCTION AND APPROVAL OF VEHICLES Chapter 9.7 / Additional requirements concerning fixed tanks (tanks-vehicles), battery-vehicles and complete or completed vehicles used for the carriage of dangerous good in demountable tanks with a capacity greater than 1m3 or in tank-containers, portable tanks or MEGCs of a capacity greater than 3m3 (EX/III, FL, OX and AT vehicles**)** **9.7.2 Requirements concerning tanks**
9.7.2.1 Fixed tanks or demountable tanks made of metal shall meet the relevant requirements of Chapter 6.8. [...]
6.8.2.7 Requirements for tanks which are not designed, constructed and tested according to standards Tanks which are not designed, constructed and tested in accordance with the standards set out in 6.8.2.6 shall be designed, constructed and tested in accordance with the provisions of a technical code providing the same level of safety and recognised by the competent authority. Tanks shall, however, comply with the minimum requirements of 6.8.2.

- **Issue**
  Is it possible to deliver an approval according to 98/91/EC for a dangerous good tank vehicle whereas prescriptions of chapter 6.8 of ADR 2007 can be national or European ?

Decision
There was no clear position found in the meeting. France will pass this question to MVWG and WP15 to make clear how to deal with this issue.

6.7 2007/46/EC, established in the Community, Article 3, Bulgaria 1

Issue:
Art.3, item 28, stipulates that:
28. “manufacturer’s representative” means any natural or legal person established in the Community who is duly appointed by the manufacturer to represent him before the approval authority and to act on his behalf in matters covered by this Directive, and where reference is made to the term ‘manufacturer’, it is to be understood as indicating either the manufacturer or his representative;

Question:
Is there a common understanding between Member States that the above-mentioned definition includes the possibility of establishment of manufacturer’s representative in EFTA countries which are member of European Economic Area?

Possibilities of solution:

	A	**Bearing in mind that the act is with European Economic Area relevance we consider that according to the indicated definition under new framework Directives, the “manufacturer’s representative” may be established in the EEA EFTA States**	
	B	**Other decision (please specify)**	

Solution		**accepted**	**refused**
	A	**X**	
	B		
	:		

Decision
Answer A is accepted in general. Commission will pass this question to its legal service, also having a view on Switzerland, which is no member of the EEA. The answer will be given to the TAAM.

6.8 2007/46/EC, Article 44, certified true copy, Bulgaria 2

Issue:
Art.44, para. 2, provides that:
2. On application by the manufacturer or, in the case of individual approval, by the owner of the vehicle and on submission of the information required, the Member State concerned shall complete and issue the type-approval certificate or the individual approval certificate as appropriate. The certificate shall be issued to the applicant.

With respect to vehicles of the same type, other Member States shall accept a certified true copy as proof that the requisite tests have been carried out.

Question:
We would like to ask other Member States to express their opinion on the Directive wording requires "certified true copy" of the certificate – is this provision calls for any special authentication of the document in order to be regarded as an acceptable proof or stamping/signing by the approval authority is enough for the purpose of Directive.

Decision
Strictly seen, there should be a stamped paper copy by an authority. It can be demanded in the language of each MS. In general, an Approval in English language on ETAES should be acceptable.

6.9 2007/46/EC Type definition compared to National Approv. type def., Germany 6

Request of clarification for "New type date implementation":

As there is no common vehicle type definition today in EU for national vehicle approval, for M2, M3 and N categories, we would like to clarify what can be agreed as a NT definition in EU in order to be sure that the NT date of the framework directive is implemented in the same way all throughout EU.

Every Member State in EU has its own definition of "a type of vehicle" with regards type approval whereas the framework directive has a clear definition of a type of vehicle in Annex II part B.

So, our proposition is to consider as a new type, as from 29 April 2009 for M2 & M3 and as from 29 October 2010 for N categories, only a vehicle for which a new characteristic according to Annex II part B is to be type approved. So a new national vehicle approval could be given after these dates if it doesn't generate a new type according to the framework directive logic.

We have tried to illustrate with examples our proposition:

Only the following requests of approvals **would mandate WVTA** after 29 April 2009 for M2 & M3 and 29 October 2010 for N categories

- A new range (new manufacturer's designation)
- A new category (ie N2) on a truck only already type approved as an N3 all throughout EU.
- A new power plant (ie: hybrid truck) to be type approved based on an existing and type approved range
- An 8x4 configuration on a range where no 4 axles configuration have yet been type approved

As a consequence, the request of approvals of a new emission level (Euro 4 to Euro 5), a new engine capacity, a new Maximum Technical Permissible Laden Mass, a new power …could be managed nationally up to the existing type of vehicles date, without mandating WVTA.

Decision
National Type Approvals can be extended. So the question depends on the national type definitions. Even new NTA can be granted, but the type criteria of the framework directive should not be exceeded.

7 ITEMS RELATING TO FRAMEWORK DIRECTIVE 70/156/EEC (MOTORVEHICLES)

7.1 70/156/EEC, EC WVTA approvals for Chinese M1 vehicles, European Commission 1

Question No X (Directive 70/156/EEC)

Two Member States have expressed concerns about two EC WVTA approvals granted to Chinese M_1 vehicles[2].

In one case, the position of the R point above the ground is questioned. In the second case, no type, variant or version have been created whilst advertising booklets show that different models are proposed.

The Commission would like to know whether other Member States have identified specific issues regarding those approvals.

Question No X (Directive 2007/46/EC)

By contrast to Directive 70/156/EEC, electric vehicles under Framework Directive 2007/46/EC will have to be granted EC whole vehicle type-approval before they may be put on the market as from 29 April 2009.

The Commission would like to know how the issue of certifying the power of electric motors has been tackled by the national approval authorities as no directive currently regulates it.

Decision
The granting TAA have attended to the issues of the questioned approvals. One TAA has already clarified the concerns and will shortly issue and extension, fixing the mentioned points. No more issues to those type type approvals are raised.

7.2 72/245/EEC, EMC for Trolleybuses, Belgium 3

[2] e4*2001/116*0133*00 and e3*2001*116*0266*00

KBA

EMC for Trolleybuses

Legislation
EMC Directive 72/245/EEC as last amended by 2006/28/EC
Framework Directive 2007/46/EC - Article 3 - Definitions
Regulation R107.02 / ECE - Paragraph 2 – Definitions
Regulation R10.02

Framework Directive 2007/46/EC - Article 3 – Definitions

11. **"motor vehicle"** means any power-driven vehicle which is moved by its own means, having at least four wheels, being complete, completed or incomplete, with a maximum design speed exceeding 25 km/h.

14. **"hybrid motor vehicle"** means a vehicle with at least two different energy converters and two different energy storage systems (on-vehicle) for the purpose of vehicle propulsion.

15. **"hybrid electric vehicle"** means a hybrid vehicle that, for the purpose of mechanical propulsion, draws energy from both of the following **on-vehicle** sources of stored energy/power :
- a consumable fuel
- an electrical energy/power storage device (e.g. battery, capacitor, flywheel/generator, etc.)

Regulation R107.02 / ECE - Paragraph 2 – Definitions

2.1.8. "Trolleybus means a vehicle, electrically driven by energy **from external, overhead contact wires**. For the purposes of this Regulation, it also includes such vehicles having an additional internal means of propulsion (dual mode vehicles) or having a means of temporary external guidance (guided trolleybuses).

Issue
- Only Regulation R107 gives a definition for a trolleybus, electrically driven by energy from external, overhead contact wires.
- Framework Directive 2007/47/EC gives 2 definitions for hybrid vehicles, none of them suitable for a trolleybus driven by external energy.
- For the scope of EMC Directive 72/245/EEC - 2006/28/EC, reference is made to the vehicles defined in the Framework Directive.
- Some Member States interprete this situation as trolleybuses being out of the scope of the EMC Directive(s). Other Member States didn't transpose this Directive into national law yet, but have there own mandatory EMC standards and related (expensive) tests. In view of European harmonization, we ask the opinion of the other TAAM members regarding following questions :
-

Questions
1) Definition of trolleybus to be added to the text of the Framework Directive ?

2) Are trolleybuses (defined as vehicles driven by external electrical energy) in or out the scope of the above-mentioned EMC Directives ?

3) If trolleybuses are in the scope of the EMC Directives, how to comply with the vehicle test area prescriptions in view of the need for external electrical supply during the tests ?

4) Which (European) Technical Services are EC-notified for EMC tests on trolleybuses, pursuant to the EMC EC - Directives ?

Decision
1) Trolleybuses are within the scope of the framework directive. A special definition would just be needed, if there are special conditions for approving.

2) According to answer 1) trolleybuses are in the scope of the mentioned EMC-directives

3) There is no final solution presented. One way might be, to do every test seperately. But also other system approvals might get complicated like e.g. noise. But as not all single legal acts can be met, a WVTA is not mandatory.

7.3 96/53/EC, Tridem axle (mass of the axles), Italy 1

Issue
I would like to ask your opinion concerning type approval of the following motor vehicle (see attached)
This vehicle has a tridem axle (the central axle being a driving axle)
The distance between axis is 1395mm.
At national level the maximum permissible mass of the vehicle is 32 t. In particular, for the tridem axle we have assigned 28 t (8 + 12 on the driving axle + 8).
Concerning the circulation of this vehicle in the Community we have noted that Directive 96/53/EC does not explicitily consider the case of a tridem axle on a motor vehicle.
Our interpretation is to consider a tridem axle as a combination of 2 tandem axles. Therefore, for intercommunity traffic we have assigned 7.5 t + 11.5 t (driving axle) +7.5 t and a maximum permissible mass of 32 t.

May I ask you whether:

- the assigned loads for each axle for intracommunity traffic are correct?

- can we issue a certificate according to Directive 97/27/EC which refers to both mentioned national and EC masses?

Decision
The assigned loads cannot be agreed on. It's depending on each MS. But there can be issued a certificate according to directive 97/27/EC which refers to both mentioned national and EC masses.

7.4 70/311/EEC, Hydraulic steering 1st axle of trailer, Latvia 2

Problem
Hydraulic steering 1st axle of trailers which can be able to steer by driver from the cab. Problem is about steering effort type approval.

Question regarding hyraulic powered steering 1st axle of trailer:
There is a question regarding trailers with self-steering 1st axle what can be in additional hydraulic power steered. For example, long timber trailers (2 or 3 axles) without the coupling device connection between the truck and the trailer where this function is carried out by means of the load (timber). Please, find attached the pictures with an example of Doll trailers.

This kind of trailers has self-steering 1st axle, controlled by log support pillars of the trailer. The driver is able to steer the trailer from the cab by means of the control device which engages hydraulic device on the trailer.

1. Is it necessary to have the type approval certificate or the test report in accordance of 70/311/EEC or ECE79 issued by the official technical service for this kind of steering system (effort)?

2. What kind of bodywork is the vehicle (see pictures below)?

Possibilities of solution | Comments

1. Question:

	A	The type approval certificate or the test report in accordance of 70/311/EEC or ECE79 is mandatory.	
	B	The type approval certificate or the test report in accordance of 70/311/EEC or ECE79 is not required	

2. Question:

	A	Trailer	
	B	Semi – trailer	Only connection with truck carried out by means of the load

1. Question:

Selection of solution		accepted	refused
	A	**X**	
	B		**X**

2. Question:

Selection of solution		accepted	refused
	A		**X**
	B	**X**	

Decision
The questioned vehicles are not accepted on roads of all MS. As the vehicles are not covered by the vehicle categories of the framework directive, an EC-WVTA is not possible. Only national approvals are possible.

7.5 96/27/EC / ECE R 95.02, Acceptability of EUROSID 2, Netherlands 2

Subject:
Acceptability of EUROSID 2 (ES-2dummy as prescribed in ECE R95.02 Supplement 1) for approvals in accordance with 96/27/EC

Reference to Annex, etc in the Directive or Regulation:
- 96/27/EC, Appendix 3 - ECE R95.02, Supplement 1, Annex 6

Text:

This question has already been discussed during TAAM in Madrid on 9 and 10 March 2005. At that moment the European Commission was not a signatory to ECE Regulation 95 but since that meeting the European Commission has become signatory and therefore an approval in accordance with ECE R95.02 including Supplement 1 is now an alternative to a 96/27/EC approval for obtaining a Whole Vehicle Type Approval. Moreover until 12 August 2007 it was possible to issue both a 96/27/EC and ECE R95.02 approval using EUROSID 1 but since that date ECE R95.02 Supplement 1 forces to using EUROSID 2. The problem is that some manufacturers prefer to receive also a 96/27/EC approval in addition to the ECE R95.02 approval. It is generally accepted that EUROSID 2 is “worst case” with regards to the performance of a vehicle in case of a side impact test. Therefore requiring an additional test with the EUROSID 1 for a 96/27/EC approval only results in substantial extra costs without adding any contribution to the safety level of the vehicle.

Question:
Is it possible to perform one side impact test using EUROSID 2 to cover for both 96/27/EC and ECE R95.02 Supplement 1?

Solutions:		
A	Yes, it is acceptable to use EUROSID 2 to cover for both 96/27/EC and ECE R95.02 Supplement 1	Performing an additional test is costly because of the additional test and the costs for maintaining the EUROSID 1 and there is no increase of the safety level at all
B	A 96/27/EC approval can only be issued when a side impact test has been performed with an EUROSID 1	

Decision:		
Solution	*Accepted*	*Refused*
A	**X**	
B		**X**

Decision
Solution A is agreed on. Tests should be done according to UNECE R95 and an EC-TA can be issued. This should be remarked in the approval documents.

7.6 92/24/EEC, Speed limiters, Poland 1

Background:
Subject No. 47 (speed limiters – regulatory act: 92/24/EEC), as listed in Annexes IV and IX to the Directive 2007/46/EC, applies to $M_3/N_2/N_3$ category vehicles, respectively.
Since 17.02.2004 though, Council Directive 92/24/EEC covers M_2 category vehicles as well. Fitting of speed limiters in vehicles of such category is also obligatory according to the EEC Directive 92/6 (as amended by the Directive 2002/85/EC).

Question:
In case of an M_2 category vehicle, not equipped with (required) speed limiter, should MS:

1. not refuse to grant EC whole vehicle type-approval, on grounds related to speed limiters?
2. refuse to grant EC whole vehicle type-approval?
3. not refuse to register, sale or put into service of such vehicle on grounds related to speed limiters
4. refuse to register, sale or put into service of such vehicles?

Possibilities of solution		Comments
A	First option is accepted	
B	Second option is accepted	
C	Third option is accepted	
D	Fourth option is accepted	

Decision
Answers B and D are accepted. Speed limiters are mandatory. Only exception would be when the design speed of the vehicle is below the speed limit.

7.7 2001/85/EC, Bus doors warning signal of M3 category vehicles, Latvia 1

Problem
Necessity of an audible warning signal of M3 category vehicles not fitted with a starting prevention device if the vehicle is driven away from rest when any power-operated service door is not fully closed.

Question is about an audible warning device fitting on vehicles which doors are complying with the requirements of paragraph 7.6.5.6.1.2.1. of Directive 2001/85/EC.

Requirements of Directive 2001/85/EC concerning audible signal:

"7.6.5.9. If the vehicle is not fitted with a starting prevention device, an audible warning to the driver **shall be activated** if the vehicle is driven away from rest when any power-operated service door is not fully closed. This audible warning shall be activated at a speed exceeding 5 km/h for doors complying with the requirements of paragraph 7.6.5.6.1.2.3;

Requirements of Directive 2001/85/EC concerning the construction and control system of every power-operated service door

7.6.5.6.1.2. The second requirement is that whenever the doors are closed onto the wrist or fingers of a passenger:

7.6.5.6.1.2.1. the door reopens automatically to its fullest extent and, except in the case of an automatically operated service door, remains open until a closing control is operated, or

7.6.5.6.1.2.2. the wrist or fingers can be readily extracted from the doors without risk of injury to the passenger. This requirement may be checked by hand, or by means of the test bar mentioned in paragraph 7.6.5.6.1.1, tapered at one end over a length of 300 mm from a thickness of 30 mm to a thickness of 5 mm. It shall not be treated with polish nor lubricated. If the door traps the bar it shall be capable of being easily removed, or

7.6.5.6.1.2.3. the door is maintained at a position allowing the free passage of a test bar having a section of height 60 mm, width 20 mm, with corners radiused to 5 mm. This position shall not be more than 30 mm distant from the fully closed position.

Possibilities of solution Comments

	A	An audible warning device must be fitted on vehicle if a starting prevention device is not fitted.	Audible warning signal *anyway must be activated even doors* are complying requirements of paragraph 7.6.5.6.1.2.1. If doors of the bus comply with the requirements of paragraph 7.6.5.6.1.2.3. only provision about speed exceeding 5 km/h is in force.
	B	An audible warning device is not required if doors of the bus are complying requirements of paragraph 7.6.5.6.1.2.1.	

Selection of solution		accepted	refused
	A	**X**	
	B		**X**

Decision
Answer A is accepted.

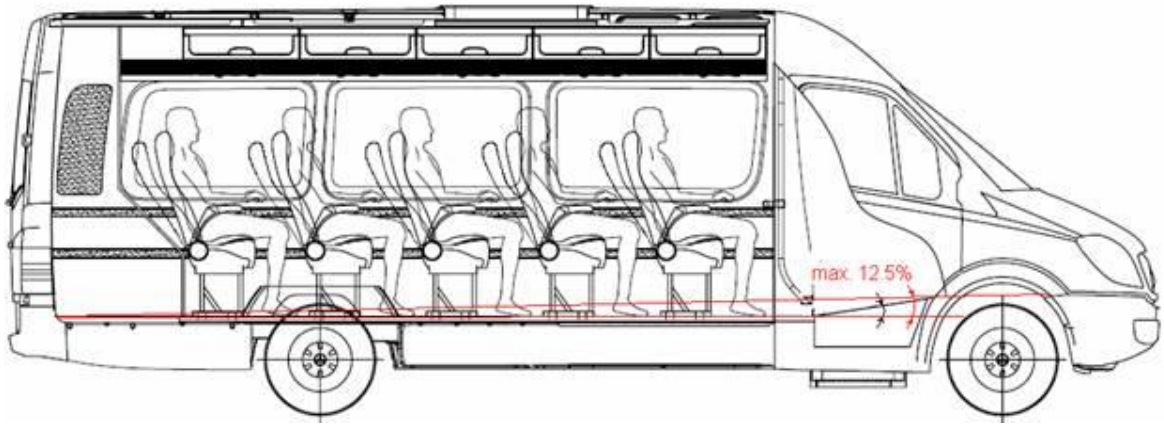
7.8 2001/85/EC, Slope of gangway M2 category, Latvia 3

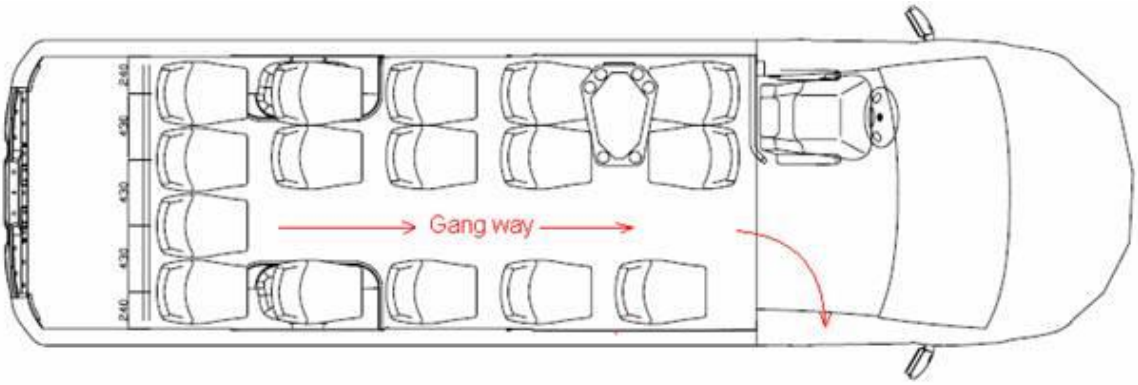
Problem

Interpretation of measuring methods for the slope of gangway of M2 category vehicles (classes B) .

Question about slope of gangway:

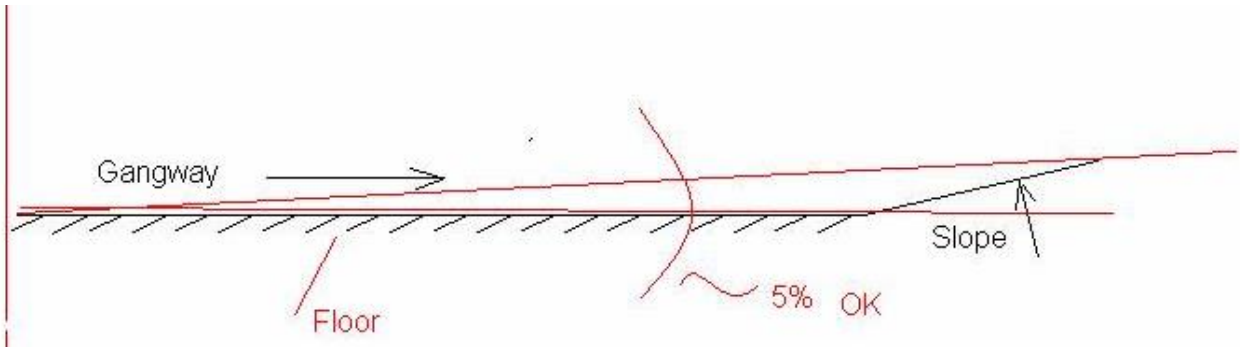
How we must measure the slope of gangway? Do we have to measure it in each point (different pieces) or in all length? If we measure the slope of gangway in the complete length then the slope percentage is ok, but if we measure it in beginning of gangway (above gearbox tunnel) the slope percentage is over the limit. In that case do we have to cut or level out the floor?



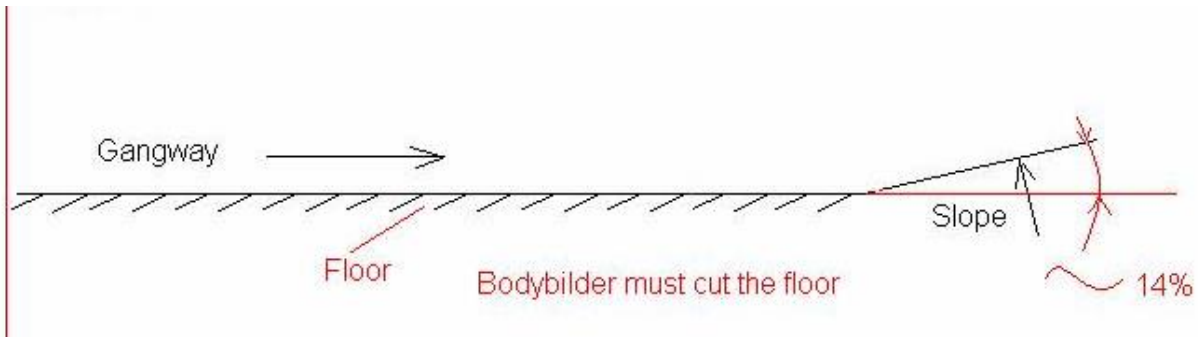


: **B:**

A:



B:



Requirements of Directive 2001/85/EC concerning slope of gangway:

"7.1. General

7.1.1. Unless otherwise stated, all measurements shall be made when the vehicle is at its mass in running order and it is standing on a smooth and horizontal ground surface and in the normal condition for travel. If a kneeling system is fitted, it shall be set so the vehicle is at its normal ride height for travel. In the case of the approval of bodywork as a separate technical unit the position of the body relative to the flat horizontal surface shall be specified by the manufacturer.

7.1.2. Wherever there is a requirement in this Directive for a surface in the vehicle to be horizontal or at a specific angle when the vehicle is at its mass in running order, in the case of a vehicle with mechanical suspension, the surface may exceed this slope or possess a slope when the vehicle is at its mass in running order, provided that this requirement is met when the vehicle is in the loading condition declared by the manufacturer. If a kneeling system is fitted to the vehicle it shall not be in operation.

...

7.7.6. Slope of gangway

The slope of the gangway, measured with the vehicle unladen on a horizontal surface, and with the kneeling system not activated, shall not exceed:

7.7.6.1. 8 % in the case of a vehicle of Class I, II and A;

7.7.6.2. 12,5 % in the case of low-floor vehicles of Class I or II referred to in Article 2(2), in respect of the inner part of the gangway, 2 m either side of the second axle centre line and, if appropriate, of the third axle, for a total length of 2 m;

7.7.6.3. 12,5 % in the case of a vehicle of Class III and B, and

7.7.6.4. 5 % in the case of the plane perpendicular to the longitudinal axis of symmetry of vehicle."

Possibilities of solution Comments

	A	We measure the slope of gangway in the complete length then the slope percentage is ok.	
	B	We measure it in beginning of gang way (above gearbox tunnel) the slope percentage is over the limit. In that case we have to cut or level out the floor.	

Selection of solution		accepted	refused
	A		**X**
	B	**X**	

7.9 2001/85/EC, Coaches (class III), Romania 1

Coaches (class III)

Fact: It wasn't possible for some coaches to move the cylindrical gauge (figure 6 annex III) in the front section of the gangway due to some interior fittings (TV set or special shape of the ceiling), in the case when the seats were mounted on a superstructure of the floor and the first row was very near behind the driver's seat.

Question: Is it possible to take this superstructure as a step and as a part of the service door?

If yes, it will be in the client's advantage: the cylindrical gauge will stop with its middle section in the front of the virtual perpendicular plane including the edge of this "step" and from this point the checking will be done with the panel gauge, 2 cm thickness, having the same shape as the cylindrical one (see 7.7.1.4. and 7.5)

Answer	YES	**NO**	Remarks

Pict. no. 1

Uppermost step of the door apperture ??

or..

No common answer can be found in the meeting. Romania will forward the question to GRSG and will report to the next TAAM.

7.10 97/27*2001/85*2003/19/EC, Restricted area in the gangway (Buses class II), Romania 2

Buses class II

Fact: Some manufacturers declare in the approval documents restricted areas in the gangway for the standing passengers (to limit their number, almost due to mass / masses limitations).

Question: Must these areas to be marked by special labels or by other means or the declaration, inserted in the technical documents / drawings, is enough?

Declaration in the technical document is enough, because there is no obligation in the directive.

7.11 2001/85/EC, Buses class I – III, Romania 3

Buses class I - III

Fact: The wheel arches for some buses diminished the access space for the simple service doors (minimum 650 mm). The doors fulfil the requirements of point. 7.7.1.4 yet.

Question: How may we judge this problem trying do not hamper the clients? Are we allowed to "borrow" the provisions of Annex VI and apply them to class I – III vehicles?

The door outcut has to be 650 mm wide. Inside the vehicle it depends on the shape of the mannequin.

7.12 2001/56/EC, LPG Heating systems, Sweden 1

RELEVANT SECTION:

Directive 2001/56/EC, as amended by Directive 2006/119/EC Annex VIII, paragraph 1.1.3. and 2.1.3.

TEXT: 1.3. LPG HEATING SYSTEMS FOR ROAD USE IN MOTOR VEHICLES

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) (3).

2.3. LPG HEATING SYSTEMS FOR STATIONARY USE ONLY IN MOTOR VEHICLES AND THEIR TRAILERS

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

(3) EN 1949:2002 is prepared by the European Committee for Standardisation (CEN). EN 624:2000 refers to EN 1949:2002 (see point 1.1.1).

EN 1949:2002

6.1Pressure regulation systems

6.1.1 The LPG installation shall have a pressure reduction system installed and this shall be fitted before the vehicle is sold to the consumer.

Pressure regulation systems in road vehicles shall have a fixed working pressure of 30 mbar and comply with the requirements of EN 12864:2001, annex D. The flow rate of the pressure regulation system shall be at least the maximum capacity of the entire installation, including all appliances installed by the manufacturer.

6.3 Devices to protect against over pressure

For road vehicles a device/devices shall be provided within the installation or integral with the pressure regulation device to ensure that a pressure greater than 150 mbar is not supplied to any appliance.

Question/problem/Concern:

We have on the Swedish market noticed that caravans do not have this double function even though they have a type approved heating system.

Can a vehicle be approved without double functions for protection against over pressure (two membranes) and still fulfil the requirements in 2001/56/EC ?

		Yes	
		No	

Selection of solution		accepted	refused
1. Yes			
1. No		X	

7.13 70/156/EEC, Annex VIII, emission values, Sweden 2

Directive 70/156/EEC, Annex VIII
In each case, the information must make clear to which variant and version it is applicable. One version may not have more than one result. However, a combination of several results per version indicating the worst case is permissible. In the latter case, a note shall state that for items marked (*) only worst case results are given.

Question/Problem/Concern:

Can emission values be presented in an interval? Examples have been found.

1	**A**	Yes	
1	**B**	No	

How complicated may the presentation of values be? The results are sometimes presented in a way that you need special keys and sophisticated guesses to understand the values.

2	**A**	The values must be relatively easy to follow	
2	**B**	Any presentation is acceptable.	

Selection of solution		accepted	refused
1. Yes	***A***		
1. No	**B**	**X**	
2. The values must be relatively easy to follow	***A***	**X**	
2. Any presentation is acceptable.	**B**		

7.14 70/221/EEC, Trailers O1, O2 and rear under run protection, Sweden 5

RELEVANT SECTION: **Directive 70/221/EEC, Annex II, paragraph 5.2.**

5.1. All vehicles must be so constructed and/or equipped as to offer effective protection over their whole width against underrunning from the rear by a vehicle of categories M1 and N1 (1).

5.1a. The vehicle shall be tested under the following conditions ……

5.2. Any vehicle in one of the categories M1, M2, M3, N1, O1 or O2 (1) will be deemed to satisfy the condition set out in 5.1:
— if it satisfies the conditions set out in 5.3, or
— if the ground clearance of the rear part of the unladen vehicle does not exceed 55 cm over a width which is not shorter than that of the rear axle by more than 10 cm on either side (excluding any tyre bulging close to the ground).

Where there is more than one rear axle, the width to be considered is that of the widest.
This requirement must be satisfied at least on a line at a distance of not more than 45 cm from the rear extremity of the vehicle.

5.3. Any vehicle in one of the categories N2, N3, O3 or O4 (1) will be deemed to satisfy the condition set out in 5.1 provided that:
— the vehicle is equipped with a special rear underrun protective device in accordance with the requirements of 5.4, or
— the vehicle is so designed and/or equipped at the rear that, by virtue of their shape and characteristics, its component parts can be regarded as replacing the rear underrun protective device. Components whose combined function satisfies the requirements set out in 5.4 are considered to form a rear underrun protective device.

QUESTION / PROBLEM /CONCERN:

Can a type approval be accepted when the width is based on the loading platform instead of the axels/wheels (width of tyres cover up to 200 mm)?

		Yes	
		No	

Selection of solution		
1. Yes		X
1. No		

Decision
Answer B, the width of the underrun protection should not be shorter than that of the rear axle by more than 10cm on either side.

7.15 71/320/EEC, Inertia braking systems of trailer (Definition G_A mass), France 1

Annex VIII / Conditions governing the testing of vehicles with inertia (overrun) braking systems

2.SYMBOLS AND DEFINITIONS
2.2.1. G_A : 'maximum mass' of the trailer declared to be technically permissible by the manufacturer
2.2.2. G'_A : 'maximum mass' of the trailer which, according to the manufacturer' s declaration, can be braked by the control device

2.2.3. G_B : 'maximum mass' of the trailer which can be braked by the joint operation of all the trailer brakes $G_B = n \times G_{Bo}$

2.2.4. G_{Bo} : Election of the permissible 'maximum mass' which, according to the manufacturer's declaration, can be braked by one brake

9. COMPATIBILITY OF THE CONTROL DEVICE AND THE BRAKES OF A VEHICLE
9.2.2. Mass
9.2.2.1. The maximum mass of the trailer G_A shall not exceed the maximum mass G'_A for which the control device is authorised.
9.2.2.2. The maximum mass of the trailer G_A shall not exceed the maximum mass G_B which can be braked by the joint operation of all the trailer brakes.

- **Issue**

How do you understand the G_A mass ?

Possibilities of solution			**Comments**
1	A	G_A is the sum of the mass on the coupling device and the mass on the axle(s) of the trailer	
	B	G_A is only the mass on the axles(s) of the trailer	It means that the mass on the coupling device is braked by the towing vehicle

Selection of solutions		Accepted	Refused
	A		X
	B	**X**	

7.16 70/221/EEC, 70/220/EEC, ECE-R 34, Chained or tethered filler cap, France 2

Annex I / Tank for liquid fuel

5.9. The fuel must not escape through the tank cap or through the devices provided to compensate excess pressure during the foreseeable course of operation of the vehicle. In the case of overturning of the vehicle, a drip may be tolerated provided that it does not exceed 30 g/min; this requirement must be verified during the test prescribed in Section 6.2 .
5.9.1. The tank cap must be fixed to the filler pipe: the seal must be retained securely in place, the cap must latch securely in place against the seal and filler pipe when closed.
5.9.1.1. The requirements of Section 5.9.1 will a deemed to be satisfied if the vehicle meets the requirements of Section 5.1.3 of Annex 1 to Directive 70/220/EEC subject to the provision that the examples listed in the third indent of that section do not apply to vehicles in categories other than M1 or N1.

- ***Text of Directive 70/220/EEC amended 2003/76/EC***

Annex I / Scope, definitions, application for EC type-approval, granting of EC type-approval, requirements and tests, extension of EC type-approval, conformity of production and in-service vehicles, on-board diagnostic (OBD) systems

5.1.3. Provision must be made to prevent excess evaporative emissions and fuel spillage caused by a missing fuel filler cap.
This may be achieved by using one of the following:
- an automatically opening and closing, non-removable fuel filler cap,
- design features which avoid excess evaporative emissions in the case of a missing fuel filler cap,
- any other provision which has the same effect. Examples may include, but are not limited to, a tethered filler cap, a chained filler cap ore one utilizing the same locking key for the filler cap as for the vehicle' s ignition. In this case the key must be removable from the filler cap only in the locked condition.

- ***34 Text of ECE Regulation***

5.9.1. The fuel filler cap must be fixed to the filler pipe.
5.9.1.1. The requirements of paragraph 5. 9. 1. will be deemed to be satisfied if provision is made to prevent excess evaporative emissions and fuel spillage caused by a missing fuel filler cap. This may be achieved using one of the following:
5.9.1.1.1. an automatically opening and closing, non-removable fuel filler cap.
5.9.1.1.2. design features which avoid excess evaporative emissions and fuel spillage in the case of a missing fuel filler cap,
5.9.1.1.3. any other provision which has the same effect. Examples may include, but are not limited to, a tether filler cap, a chained filler cap or one utilising the same locking key for the filler cap and for the vehicle' s ignition. In this case, the key shall be removable from the filler cap only in the locked condition.
However, the use of tethered or chained filler cap by itself is not sufficient for vehicles other than those of categories M1 and N1.

- ***Point 6.9 of Brussels TAAM report in 2004***

Question from The Netherlands :
The conclusion of the TAAM in Delft was that the chain was only intended to prevent the loss of the filler cap and that it would also be permitted for the non-M1 and the non-N1 vehicles for fulfilling the requirements of the directive 71/221/EEC.
Was this conclusion correct or not?

Suggestion :
As the text of directive 70/221/EEC is absolutely clear in its wording that a chained or tethered filler cap for non-M1 and non-N1 vehicles are not sufficient. This is confirmed by ECE-regulation 34. We believed that the conclusion of the Delft meeting was incorrect.
Starting immediately we should not accept a chained or tethered filler cap by itself as sufficient for meeting the requirements of 70/221/EEC, annexe I, 5.9.1.

Decision :
The Dutch approval is accepted. There should be no new type-approvals on vehicles other than M1 and N1 with only chained or tethered filler cap.
It should be noted that the German version of the Directive allows the acceptance of this solution also for vehicles other than M1 and N1.

- ***Issue***

Can an EC type-approval according to 70/221/EEC with only a chained or tethered filler cap be delivered for non-M1 and non-N1 vehicles today?

Possibilities of solution			**Comments**
1	A	Yes, we can deliver such a EC type approval.	
	B	No, such an approval does not fulfil 70/221/EEC requirements?	

Selection of solutions		Accepted	Refused
	A		**X**
	B	**X**	

Decision
According to the English text answer B is agreed on. There are differences in the language versions, e.g. the German version allows also answer A. Germany will initiate a change of the differing German directive text and informs German manufacturers.

7.17 71/127/EEC, 2003/97/EC, Rear-view mirrors of motor vehicles, France 3

Annex II / Design specification and tests required for EEC component type-approval of rear-view mirrors

4. MARKING
4.2. The EEC component type-approval mark shall consist of a rectangle surrounding the lower case letter 'e' followed by the distinguishing letter(s) or number of the Member State which has granted the component type-approval:
[...]
The amendment sequence number and the component type-approval number shown on the certificate shall be separated by an asterisk. In this Directive the sequence number is 02. Sequence number 01 may, however, be retained for Class I, II and III rear-view mirrors if the requirements relating to these three classes of mirror remain unchanged.

- ***Text of Directive 2003/97/EC amended 2005/27/EC***

Annex I / Definitions and administrative provisions for EC type-approval

APPENDIX 5 / EC COMPONENT TYPE-APPROVAL MARK
1. GENERAL

1.1. The EC component type-approval mark shall consist of a rectangle surrounding the lower case letter "e" followed by the distinguishing number of the Member State which has granted the component type-approval:

[…]

The amendment sequence number and the component type-approval number shown on the certificate shall be separated by an asterisk. In this Directive the sequence number is 03..

- ***Issue***

As directive 71/127/EEC has been repealed by 2003/97/EC, a 2003/97/EC approval for the installation on a vehicle of rear-view mirrors components which are approved by 71/127/EEC (they have a sequence number 02 but their fields of vision fulfil the requirements of directive 2003/97/EC) can be accepted ?

Possibilities of solution			**Comments**
1	A	Yes, you can accept a 2003/97/EC approval for the installation on a vehicle of sequence number 2 rear view-mirrors if they have a field of vision which fulfilled the 2003/97/EC requirements	
	B	No, you cannot do a 2003/97/EC approval for the installation on a vehicle of sequence number 2 rear view-mirrors if they have a field of vision which fulfilled the 2003/97/EC requirements	

Selection of solutions		Accepted	Refused
	A	**X**	
	B		

7.18 2001/56/EC, Transport refrigeration unit, France 4

Annex II / Scope, definitions and requirements
1. SCOPE 1.1. This Directive applies to all vehicles in categories M, N and O where a heating system is fitted.
2. DEFINITIONS For the purposes of this Directive: 2.1. 'Heating system' means any type of device which is designed to increase the temperature of the interior of a vehicle, including any load area.

- ***Issue***

For vehicles with conditioned load area, transport refrigeration unit is used both to decrease or to increase temperature.
Is a transport refrigeration unit, used to control the temperature in the load area, in the scope of 2001/56/EC ?

Possibilities of solution			Comments
1	A	Yes, such a transport refrigeration unit is in the scope of 2001/56/EC	
	B	No, such a transport refrigeration unit is not in the scope of 2001/56/EC	

Selection of solutions		Accepted	Refused
	A	**X**	
	B		

7.19 70/156/EEC, Annex II, part C, Classification of Multi-purpose vehicle, Czech 1

REFERENCES (Frame DIRECTIVE 70/156/EEC / ANNEX II – part C – Definition of type of bodywork):

Multi-purpose vehicle (AF) – Motor vehicle other than those mentioned in AA to AE intended for carrying passengers and their luggage or goods, in a single compartment. However, if such a vehicle meets both of the following conditions:

a) the number of seating positions, excluding the driver, is not more than six.

b) $P – (M + N \times 68) > N \times 68$ where:

P = technically permissible maximum laden mass in kg

M = mass in running order in kg

N = number of seating positions excluding the driver

This vehicle is not considered to be a vehicle of category M1.

Question/Problem/Concern:
The Czech national type-approval authority has received the approval pursuant to Directive 70/156/EEC (2001/116/EC), where this above mentioned condition is not met. In spite of that the approval authority of a member state has classified such a vehicle to be the M1 category, type of bodywork AF. Do any conditions exist enabling to grant of this approval?

1.

	A	Yes	
	B	No	

COUNTRY PROPOSAL / SUGGESTION:

1.

	A	Yes	
	B	No	**x**

Comments: Following procedure:
In case of „NO“ answer what the course of action should be taken from the side of approval authority that receives such approval and – eventually – from the side of AA which issues such homologation?

Question was revoked, because the answer was already given in question 7.1.

7.20 70/157/EEC, UNECE R 51, Selection of test vehicles – worst case, Germany 3

Question
Testing concerning the noise emissions of vehicles includes the choice of the worst case scenario vehicles. For this choice e.g. 2 vehicles have been chosen. Is this worst case scenario (Annex 3 R51 Method A) for the old testing procedure also the worst case for the new testing provisions (Annex 10 R 51 Method B)?

Issue
During the monitoring phase both – method A and B – measurements have to be carried out and the results of method B have to be monitored (Annex 9 R 51). The worst case selection might be different under the 2 measurement conditions.

There are possible ideas of selection rules:

- The worst case vehicle concerning method A is also the worst case concerning method B → only this vehicle is to be tested in both ways
- (Category M_1) The worst case vehicle of method A does not correspond to the worst case of method B, so there have to be a second vehicle for testing. For comparison reasons both vehicles will be then tested under the provisions of method A and B (4 measurements overall). Limit values are only applicable for method A.
- (other classes) There are always different worst case vehicles so only the separate worst case vehicles concerning method A and the worst case vehicle of method B will be tested and recorded.

Possible solutions:

Selection of solution		**accepted**	**refused**
A	Only 1 worst case vehicle have to be selected for tests if both methods worst cases result in the same vehicle	**X**	
B	(M1) If there are different worst case scenarios- 2 vehicles have to be selected for tests and 4 measurements will be carried out to build a comparison basis.	**X**	
C	(Other categories) 2 worst case vehicles have to be selected for tests, but only 2 measurements with the separate worst case vehicle will be done (1 method A 1 method B)	**X**	

Answer A is accepted.

7.21 70/156/EEC, Query Evaluation of rear bicycle racks, Germany 4

Question
Regrettably, the already circulated query concerning this matter, sent on 25 July 2007 to the Type Approval Authorities, hasn't been successful. We didn't receive enough opinions (only 2).

For the purpose of uniform treatment between EU-Type Approval Authorities concerning the type approval for rear bicycle racks this query has been redrafted and will be sent for revote.

Issue
Rear bicycle racks for the carriage of bicycles are frequently offered for passenger vehicles:

I) as aftermarket racks for universal use. Some are fixed to the coupling ball. In most cases the racks are equipped with additional light-signalling devices.

II) as original component of the manufacturer as optional equipment and considered within the system type approval of the vehicle.

III) as vehicle integrated racks which can be pulled out.

Appendix: 2 photographs

The question is how to ensure a high level of road safety in all cases where type approvals shall be granted. In these cases the load (bicycles) shall not be considered.
I) Rear bicycle racks for universal use can get a component approval according to Directive 74/483/EEC. For the component approval
A) only concerns of Directive 74/483/EEC (External projections) shall be taken into account,
B) additional provisions concerning the installation of lighting and light-signalling devices and the space for the fixing of rear registration plates shall be applied.

II) The vehicle manufacturer likes to integrate the rear rack that he provides as optional equipment within the system type approval concerning external projections:
A) Tests of the rack will only be conducted in accordance with Directive 74/483/EEC,
B) The racks have to comply with all applicable vehicle requirements (74/483/EEC, 76/756/EEC, 70/222/EEC and 92/21/EC).

III) The rear rack is an integrated part of the vehicle that can be positioned if required:
A) Tests of the vehicle will be conducted in buried and in operational condition, but only in relation to the external projections.
B) All applicable separate Directives (74/483/EEC, 76/756/EEC, 70/222/EEC and 92/21/EC) have to be fulfilled in buried and in operational condition as well.

Rear racks are operated in an exposed position. Kraftfahrt-Bundesamt (KBA) is of the opinion that the impact of the load distribution due to the overhang is essential and that the installation of lighting and light-signalling devices and the rear registration plate are detracted in general. On this account KBA is of the opinion that compliance with all applicable separate Directives has to be demonstrated, especially in cases where the rack is part of the WVTA.

Possible solutions:

Selection of solution	**accepted**	**refused**
I. Component as aftermarket rear rack system		

A	Only tests concerning external projections	**X**	
B	Requirements on external projections and if fitted the installation of lighting and light-signalling devices and the space for the rear registration plate		**X** *
II.	**Rear rack as optional equipment within the vehicle system type approval**		
A	Only tests concerning external projections		**X**
B	As optional equipment within the system type approval all applicable separate Directives have to be fulfilled	**X**	
III.	**Rear rack is an integrated part of the vehicle**		
A	Test of the vehicle and its rack in buried and in operational condition only concerning external projections		**X**
B	Tests in consideration of all applicable separate Directives in buried and in operational condition	**X**	

Comment:
*Solution I. B: In cases where lighting and light-signalling devices are fitted to the rear rack it would be desirable if accordance with the requirements is certified by the type approval.

Result of the second query:

Using the meaning of the majority answers type approval procedure regarding rear rack systems have to be carried out in the following way:

I. Granting of type approvals concerning directive 74/483/EEC for parts have to be solely done under consideration of that directive (external projections only).
II. Shall the rack be approved within the system type approval as optional equipment all applicable separate Directives have to be fulfilled.
III. If the rear rack is an integrated part of the vehicle it is considered in all (used) operating conditions. E.G. the lighting equipment and its switching conditions have to be taken into account regarding the provisions of R 48.

For the TAAM discussions the UK made the following suggestions:

Additional Comments

a) VCA Background Rationale:

I Component as aftermarket rear rack system

VCA response: Solution A
As we see it, if the rack is only for aftermarket sale then it can be approved as a component under the provisions of 74/483/EEC without consideration of the other subjects.

II Rear rack as optional equipment within the vehicle system type approval

VCA Response: Solution B
In terms of the vehicle systems approval for Exteriors the cycle rack would also only need to be considered in terms of 74/483/EEC (i.e. Solution A). However, the Approval Authority responsible for the whole vehicle approval would also need to ensure that the influence on other subjects was fully taken into account (typically lighting, masses & dimensions, tyres, rear registration plate etc) hence we would opt for solution B.

III Rear rack is an integrated part of the vehicle

VCA response: Solution B
The whole vehicle approval would have to consider the implications for the range of EWVTA subjects with the cycle rack (both in the closed and it the in-use condition). Again the relevant subjects would typically be lighting, masses & dimensions, tyres, rear registration plate etc.

b) Particular issue regarding lighting installation:

R48 specifies that there should only be 2 rear position, 2 rear indicator and 2 rear brake lamps on an M1 vehicle. For a normal in-use situation the bicycle would effectively block the vehicle's own rear lamps and hence the R48 requirements could be applied just to the additional lamps fitted on the cycle rack without too much conflict.

However, for Type approval purposes the cycle rack would normally be considered without a bicycle fitted and, in this case, it could be possible to see 4 rear position/rear indicator/rear brake lamps. This would contravene ECE R48.

Integrated rack

Rear rack as optional equipment within the vehicle system type approval

When carriage devices are integrated to the vehicle, they can be integrated in the WVTA. The provisions of external projections and UNECE R48 have to be applied. When there are rear lamps mounted on the pulled-out rack, the main rear lamps have to be switched off i.o.t. to exceed the number of allowed rear lights. Aftermarket products and removable racks should be seen under national law.

7.22 715/2007/EC, EURO 5/6 vehicles, emissions and data information, Germany 5

Issue

The new combined Regulation 715/2007 defines in Article 6 (2) the obligation for the manufacturer to provide all necessary repair- and maintenance-information according to Annex XIV appendix 1. It must be possible for all garages/workshops to receive this information. The time frame is 6 months after the approval date, latest 1.3.2010 (see commission regulation proposal).

Major questions arise to the fact, that the actual date of providing the data is not clear enough and what might be the sufficient dataset according to annex XIV in depth.
The TAA has to decide how to judge the statement of the manufacturer. Also questions about the scope (only emission/fuel consumption-relevant data or more?) arose.

Possible solutions:
Usually the manufacturer provides its own OEM-workshops/dealers with the necessary repair and maintenance datasets in an OASIS format. These data are solely emission/ fuel consumption relevant data.

Prescription: EC-Regulation 715/2007 Annex XIV and Article 6

Selection of solution		accepted	refused
A	The information have to be available for every interested garage/workshop/dealer latest 6 months after the approval date	**X**	
B	The standard information for the OEM-dealer-workshops/garages are sufficient	**X**	
C	Only emission-/fuel consumption-relevant information will build the scope of necessary data. (As Annex XIV describes)	**X**	

Comment
The last version of the commission regulation is more or less fixed, although it's not yet published in the official EU-Journal.

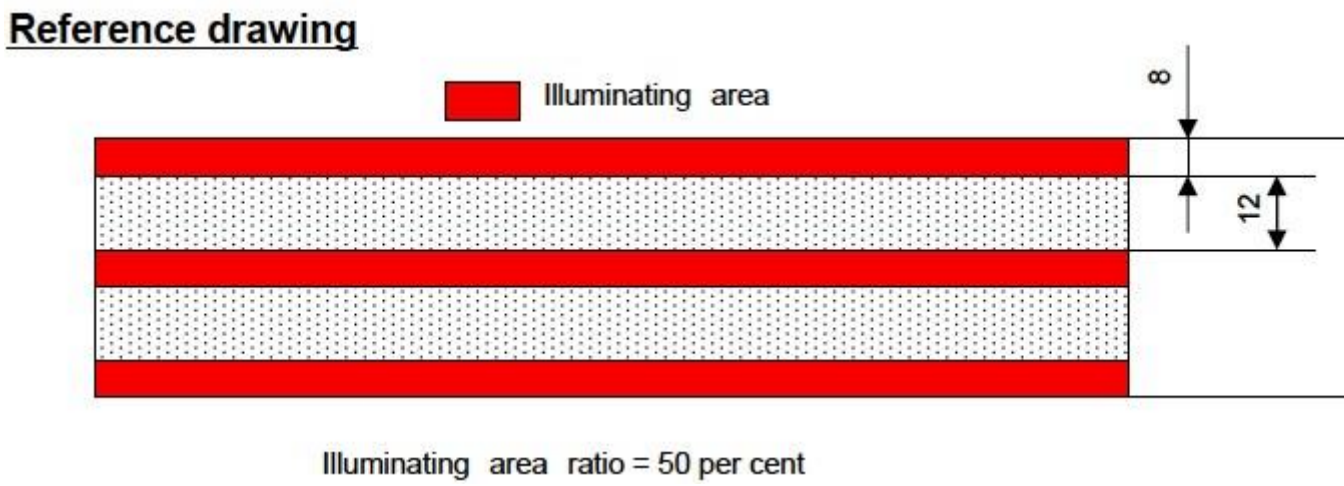
Decision
Answers A and B are accepted. Answer C is is accepted by some MS, but still under discussion. Commission sees a wider scope of mandatorily provided data. It is proposed to keep this item on the TAAM agenda.

8 ITEMS RELATING TO FRAMEWORK DIRECTIVE 2002/24/EC (MOTORVEHICLES)

8.1 93/92/EC / ECE R 53-01, Installation of lights (LED lamps), Netherlands 1

We are considering the new design of LED lamps (see attached).
The illuminating area of this light doesn't reach 60% of the whole area, but the distance between the illuminating areas becomes less than 15mm.
In the latest ECE53-01, if "the distance between two adjacent / tangential distinct parts shall not exceed 15 mm when measured perpendicularly to the reference axis", the light number is treated as one, but 93/92/EEC doesn't have this requirement.
ECE53-01(5.6.2.1.)
Either the total area of the projection of the distinct parts on a plane tangent to the exterior surface of the transparent material and perpendicular to the reference axis shall occupy not less than 60 per cent of the smallest quadrilateral circumscribing the said projection, or the distance between two adjacent / tangential distinct parts shall not exceed 15 mm when measured perpendicularly to the reference axis.
93/92/EEC(5.1.) single lamp
means a device or part of a device, having one function and one illuminating surface and one or more light sources. For the purpose of installation on a vehicle, a 'single lamp' also means any assembly of two independent or grouped lamps, whether identical or not, having the same function, if they are installed such that the projections of the illuminating surfaces of the lamps on a given transverse plane occupy not less than 60 % of the smallest rectangle circumscribing the projections of the said illuminating surfaces. In such a case, each of these lamps is, where

approval is required, to be approved as a type 'D' lamp.



Different opinions. No clear decison.

8.2 2002/24/EC, Issue of the CoC, Romania

Fact: for the national registration we received some certificates of conformity issued by societies that don't appear in the model included in the European certificate. They are, generally, European trading societies selling Chinese products made under their trade names; some of these trade names appear in the certificates, some don't. But, in both cases, the names of these societies, the names and the signatures of the authorized persons **don't appear** in the European certificates issued on the basis of the directive 2002/24*2006/96/CE, in the annex which shows the model of C.o.C. and the specimen of signature. So, we understand that these societies may sell the products under their own names, if applicable, but they aren't allowed to issue the C.o.C.

Question: Are the certificates of conformity issued by the above-mentioned societies valid or not?

The certificates of conformity are not valid. The signature of the CoC must match to the one in the approval. At upcoming problems the granting TAA should be informed.

9 ITEMS RELATING TO FRAMEWORK DIRECTIVE 2003/37/EC (AGRICULTURAL AND FORESTRY TRACTORS)

9.1 2008/2/EC, Working with codified directives (Article 6), Sweden 3

RELEVANT SECTION: **Directive 2008/2/EC, Article 6**
Article 6
Directive 74/347/EEC, as amended by the Directives listed in Annex II, Part A, is hereby repealed, without prejudice to the
obligations of the Member States relating to the time-limits for transposition into national law and application of the Directives
as set out in Annex II, Part B.
References to the repealed Directive shall be construed as references to this Directive and shall be read in accordance

with the correlation table in Annex III.

Question/Problem/Concern

In the future there will be more codified directives, how shall we handle them? What happens with type approvals that are issued under the repealed version? Nothing is written in this first codified directive about the validity of the "old" type approvals, as there is no technical change.

Do type approvals granted according to 74/347/EEC, need to be upgraded to the new directive at any point, or never?

2	**A**	Yes	
2	**B**	No	

Selection of solution		
1. Yes	***A***	
1. No	**B**	**X**

Decision
Existing approvals stay valid and extensions are still possible under the old directive. New approvals have to be granted under the new directive with a new approval number.

9.2 75/321/EEC, Steering equipment of wheeled agricultural or forestry tractors, Germany

Issue
A wheeled agricultural tractor according to directive 2003/37/EC should be equipped with an electrical steering system according to UNECE-Regulation No 79.

Acc. to 2.2.2.1 of the Annex to directive 75/321/EEC electrical or pneumatical steering transmissions are not allowed.

Acc. to UNECE-Regulation No 79 electrical transmission of steering forces is suitable for vehicles of category M, N and O.

- Directive 2003/37/EC
- 75/321/EEC
- UNECE-Regulation No 79

Possible solutions:

	A	Because the safety of a steering system with electrical transmission according to the specifications of Regulation No 79 is granted for vehicles of category M and N, there are no objections against using the same system for wheeled agricultural or forestry tractors. Type approval acc. to Regulation No 79 may	According to Annex II, Chapter B, Part II B of 2003/37/EC it is possible to use UNECE-Regulation No 79 instead of Directive 75/321/EEC. In this case the same safety aspects as for trucks will be applied to. The formal difficulty lies only in granting an ECE-

		be granted for this tractor as category N vehicle. According to Annex II, Chapter B, Part II B of 2003/37/EC this system approval is valid for whole vehicle type approval.	R 79 approval for a vehicle of category T.
	B	Alternatively a Test Report that confirms the compliance with the requirements of UNECE-R 79 for this special vehicle can be used for whole vehicle type approval	
	C	Because the scope of UNECE-R 79 is limited to vehicles of category M, N and O, it is not possible to grant a system-approval for a vehicle designed as a wheeled agricultural or forestry tractor. A Steering system with electrical transmission is not compatible with the conditions of use of a wheeled agricultural or forestry tractor.	In this case the use of the chart according to Annex II, Chapter B, Part II B of 2003/37/EC is not possible. This chart will have to be revised.

Genehmigungsbehörde „e“	1

Entscheidung für Lösung		**akzeptieren**	**ablehnen**
	A	**X**	
	B	**X**	
	C		**X**

Decision
Answers A and B are accepted, C refused. An UNECE R 79 approval is not possible but the test report can be used accordingly. The approval must be based on 75/321/EEC. In future the directive should be amended.

10 MISCELLANEOUS

10.1 Short report of the ETAES-Meeting (Germany)

See report of ETAES-meeting

10.2 97/68/EC, Alternative type approval (Annex XII, paragraph 3), Sweden 6

Directive 97/68/EC, as amended by Directive 2004/26/EC Annex XII, paragraph 3.
: "3. For engines categories H, I, and J (stage IIIA) and engines category K, L and M (stage IIIB) as defined in Article 9 section 3, the following type-

approvals and, where applicable, the pertaining approval marks are recognised as being equivalent to an approval to this Directive;

3.1. Type-approvals to Directive 88/77/EEC, as amended by Directive 99/96/EC, which are in compliance with stages B1, B2 or C provided for in Article 2 and section 6.2.1 of Annex I.

3.2. UN-ECE Regulation 49.03 series of amendments which are in compliance with stages B1, B2 and C provided for in paragraph 5.2."For engines categories H, I, and J (stage IIIA) and engines category K, L and M (stage IIIB) as defined in Article 9 section 3, the following type-approvals and, where applicable, the pertaining approval marks are recognised as being equivalent to an approval to this Directive;

Question/Problem/Concern

1. Can Annex XII, paragraph 3 as amended by Directive 2004/26/EC be read as:

   For engines categories H, I, J and K (stage IIIA) and engines category L, M, N and P (stage IIIB) as defined in Article 9 section 3, the following type-approvals and, where applicable, the pertaining approval marks are recognised as being equivalent to an approval to this Directive;"?

	A	Yes	
	B	No	

2. Can a type-approval to Directive 2005/55/EC that only includes type-approval of engine exhaust gas emissions and not the OBD requirements be recognised as being equivalent to a type-approval to Directive 97/68/EC?

3.

	A	Yes, since there is no demand for OBD in Directive 97/68/EC	
	B	No, since the demand for OBD in 2005/55/EC is compulsory and the NO_x-control might be dependent on the OBD-system	

Selection of solution		
1. Yes	***A***	**X**
1. No	**B**	
2. Yes	***A***	
2. No	**B**	**X**

Decision

Answer 1A is accepted. There should be a correction of the directive. Answer 2B is accepted.

10.3 All Regulations, Revisions to information package of ECE approvals, Netherland 3

At this moment, ECE does not have a procedure for issueing revisions to the information packages accompanying ECE approvals. ECE approvals are more and more used as equivalent to EC Directive approvals for issueing an EC WVTA. This comes with the disadvantage, that when a small change is made to the information package, not affecting the test results or the information on the approval communication form, an extension has to be issued to the ECE approval. This will affect the WVTA as well, whereas a revision wouldn't have. ECE doesn't have a procedure for issueing revisions, comparable to Article 5, Annex 3 of 70/156/EEC as amended by 2001/116/EC and article 14 to 2007/46/EC, but it also doesn't state that it would not be allowed to do so. RDW is considering to issue revisions to information packages accompanying ECE approvals in the near future.

Question:

- Which member states already issue revisions to information packages accompanying ECE approvals ?
- Which member states would refuse to accept revisions to information packages accompanying ECE approvals according to procedures similar to those stated in the framework Directive.

	Status:	
A		Yes, we already issue revisions to information packages accompanying ECE approvals
B		No, we don't issue revisions to information packages accompanying ECE approvals but are considering doing so. We accept revisions issued by other member states.
C		No, we don't issue revisions to information packages accompanying ECE approvals and do not consider doing so. We accept revisions issued by other member states.
D		No, we don't issue revisions to information packages accompanying ECE approvals and do not consider doing so. We do not accept revisions issued by other member states.

Decision:

Type approval Authority e/E	**4**	
Status	*Accepted*	*Refused*
A		X
B	X	
C		X
D		X

Remarks:

Decision
All MS will accept revisions of UNECE-approvals for EC WVTA.

10.4 ECE-R17.07, Luggage retention Requirements for 2 seated sports cars, UK1,

Background
ECE R17.07 Section 5.15.1 states that seat-backs, when in their normal position of use (i.e. upright) and located such that they constitute the forward boundary of the luggage compartment, shall have sufficient strength to protect the occupants from displaced luggage.

OK

Annex 9 Section 2.1.2 then covers vehicles with more than two rows of seats and states that, if the rearmost row of seats can be folded down to increase the luggage compartment area, the

seat row immediately in front of this rearmost row shall also be tested.

OK

Issue

Consider the test requirements for three different types of car with a luggage area behind the rearmost seats:

Car A

A small hatchback with 2 rows of seats and the rear row seat-backs can be folded forward to increase the luggage area.

- When the rear seat is in its normal position of use (i.e. upright) the rear seat-backs will be the forward boundary of the luggage area. ***Yes, to be tested***
- When the rear seat-backs are folded forward the front seats become the forward boundary of the (larger) luggage area. ***test not required***

Car B

A vehicle with 3 rows of seats and the seat-backs for rows 2 and 3 can both be folded forward to increase the luggage area.

- When all the seats are in their normal positions of use the seat-backs of row 3 will be the forward boundary of the luggage area. ***Yes, to be tested***
- When the row 3 seat-backs are folded forward the row 2 seat-backs become the forward boundary of the (larger) luggage area. ***Yes, to be tested***
- When both row 2 and row 3 seat-backs are folded forward the front seats become the forward boundary of the (much larger) luggage area.

test not required

Car C

A 2 seater sports car with only one row of seats and with a luggage area behind the seats.

- When the seats are in their normal positions of use the front seat-backs will be the forward boundary of the luggage area. ***Yes, to be tested***

Based on the wording of ECE R17.07, the luggage retention tests applicable for the above vehicle can be summarised as follows:

- For Car A it will only be necessary to test the seat-backs of the second seat row (reference Section 5.15.1). There are no tests required for the front seats. ***Yes***

- For Car B it will be necessary to test both the seat-backs of the third seat row (reference Section 5.15.1) and the seat-backs of the second seat row (reference Annex 9 Section 2.1.2.1). There are no tests required for the front seats. ***Yes***

- For Car C a literal interpretation of Section 5.15.1 would seem to deem it necessary to test the front seat-backs for luggage retention because these seats would represent the forward boundary of a luggage compartment ***Yes***

TAAM DISCUSSION

The above logic results in a situation whereby it is necessary to test the front seats of a 2 seat sports car for luggage retention and yet there is no requirement to test the front seats of vehicles with 2 or more rows of seats - even though (with rear seats folded) the front seats of these latter

vehicles would typically have to retain more luggage load than the sports car seats.
Yes, unfortunately true

It is therefore interesting to investigate the history of ECE R17 through the draft stages of its development.

In an early draft (TRANS/WP.29/GRSP/R.129/Rev.1), dated 4 September 1995, Annex 9 Section 2.1 specifically included tests for the front seats and then also covered tests for rear row seats in Section 2.2. ***Recommendation: UK should propose an Amendment to R 17(GRSP)***

A later draft (TRANS/WP.29/GRSP/R.144), dated 19 February 1996, then deleted the specific reference to front seat testing and the text of Sections 2.1 and 2.2 was merged and amended accordingly (see Appendix to this TAAM paper)

This could suggest that the final published version of R17 only intended to cover tests of seats in the rear rows and hence cars with only one (i.e. front) row of seats do not need to be tested for luggage retention. ***The normal position is important***

	Possibilities of solution		Comments
YES	**A**	Vehicles with only one row of seats (e.g. two seat sports cars) with a luggage area (large enough to accommodate the specified Type 1 test blocks) behind the seats MUST BE TESTED for luggage retention under the provisions of ECE R17 Annex 9	Only provisions of applicable (existing) requirements can be applied for type approval purposes
	B	Vehicles with only one row of seats (e.g. two seat sports cars) with a luggage area (large enough to accommodate the specified Type 1 test blocks) behind the seats DO NOT NEED TO BE TESTED for luggage retention under the provisions of ECE R17 Annex 9.	

LEGISLATION

ECE R17.07 *incl. suppl. 3*

1. SCOPE

This Regulation applies to:

(a) ***Vehicles of categories M_1 and N 1/ with regard to the strength of seats and their anchorages and with regard to their head restraints;***

(b) ***Vehicles of categories M_2 and M_3 1/ with regard to seats not covered by Regulation No. 80, in respect of the strength of seats and their anchorages, and in respect of their head restraints;***

(c) Vehicles of category M_1 with regard to the design of the rear parts of seat backs and the design of devices intended to protect the occupants from the danger resulting from the displacement of luggage in a frontal impact.

It does not apply to vehicles with regard to folding, side-facing or rearward-facing seats, or to any head restraint fitted to these seats. ***OK***

5.15. SPECIAL REQUIREMENTS REGARDING THE PROTECTION OF OCCUPANTS FROM DISPLACED LUGGAGE

5.15.1. Seat-backs

Seat-backs and/or head restraints located such that they constitute the forward boundary of the luggage compartment, all seats being in place and in the normal position of use as indicated by the manufacturer, shall have sufficient strength to protect the occupants from displaced luggage in a frontal impact. ***OK***

…..
….

Annex 9 - TEST PROCEDURE FOR DEVICES INTENDED TO PROTECT THE OCCUPANTS AGAINST DISPLACEMENT OF LUGGAGE

1. Test blocks

Rigid blocks, with the centre of inertia in the geometric centre.

Type 1
Dimensions:
300 mm x 300 mm x 300 mm
all edges and corners rounded to 20 mm
Mass:18 kg

2.1. Test of seat-backs *(see figure 1)*

2.1.1. General requirements

2.1.1.1. At the option of the car manufacturer, parts whose hardness is lower than 50 Shore A can be removed from the tested seat and head restraint for the tests.

2.1.1.2. Two type 1 test blocks shall be placed on the floor of the luggage compartment. In order to determine the location of the test blocks in the longitudinal direction, they shall first be positioned such that their front side contacts that part of the vehicle which constitutes the forward boundary of the luggage compartment and that their lower side rests on the floor of the luggage compartment.

They shall then be moved backwards and parallel to the longitudinal median plane of the vehicle until their geometrical centre has traversed a horizontal distance of 200 mm. If the dimensions of the luggage compartment do not allow a distance of 200 mm and if the rear seats are horizontally adjustable, these seats shall be moved forward to the limit of the adjustment range intended for normal occupant use, or to the position resulting in a distance of 200 mm, whichever is less. In other cases, the test blocks shall be placed as far as possible behind the rear seats. The distance between the longitudinal median plane of the vehicle and the inward facing side of each test block shall be 25 mm to obtain a distance of 50 mm between both blocks.

2.1.1.5 If the back(s) of the rear seat(s) can be folded down, they shall be secured in their upright normal position by the standard locking mechanism.

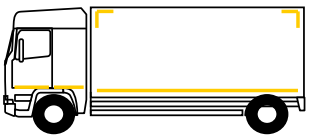
2.1.1.6 Seats behind which the type 1 blocks cannot be installed are exempted from this test

2.1.2 Vehicles with more than two rows of seats

2.1.2.1 If the rearmost row of seats is removable and/or can be folded down by the user according to the manufacturer's instructions in order to increase the luggage compartment area, then the seat row immediately in front of this rearmost row shall also be tested
Answer A is accepted

10.5 ECE-R48, Contour marking, Netherlands 4

Text:
Partial contour marking is mandatory on vehicles exceeding 6,000 mm in length (including the drawbar for trailers) and of the following categories: (a) N2 with a maximum mass exceeding 7.5 tonnes and N3 (with the exception of chassis-cabs, incomplete vehicles and tractors for semi-trailers) (b) O3 and O4

Question:
In case of a commercial vehicle, is it sufficient to indicate the vertical dimension only by marking the upper corners of the structure behind the cabin ? In other words exclude the cabin, similar to a tractor / semi-trailer combination ? Some examples contour marking commercial vehicle: a.  b.  c. 

Solutions:		
A	Yes, it is sufficient to mark only the structure	

	behind the cabin in case of a commercial vehicle.	
B	No, always take into account the vertical dimensions of the cabin in case of a commercial vehicle	

Decision:		
Solution	*Accepted*	*Refused*
A	**X**	
B		**X**

Decision
The question is postponed to the next TAAM and will be forwarded to GRE.

11 Next meetings

Bulgaria invited the TAAM-group for the meeting in spring 2010.
Next meetings will take place:
- autumn 2008 Edinburgh (UK)
- spring 2009 Switzerland
- autumn 2009 Slovenia
- spring 2010 Bulgaria