

VEHICLE CERTIFICATION AGENCY

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TYPE APPROVAL AUTHORITIES MEETING

9 & 10 OCTOBER 2008 – EDINBURGH, SCOTLAND, UK

MEETING MINUTES
(Final Version – Adopted at TAAM Bern 27 March 2009)

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TYPE APPROVAL AUTHORITIES MEETING

9 & 10 OCTOBER 2008 – EDINBURGH, SCOTLAND

HELD IN THE GREAT HALL, ROYAL COLLEGE OF PHYSICIANS OF EDINBURGH

ATTENDEES

Austria

Belgium

Bulgaria

Cyprus Not represented

Czech Republic

Denmark Not represented

Estonia

European Commission

Finland

France

Germany

Greece Not represented

Hungary Not represented

Iceland Not represented

Ireland

Italy Not represented

Latvia

Lithuania Not represented

Luxembourg

Malta

Not represented

Netherlands

Norway

Poland

Portugal

Not represented

Romania

Slovakia

Slovenia

Spain

Sweden

Switzerland

Turkey

Not represented

United Kingdom

UK Observers:

AGENDA

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- 2. Adoption of the Agenda**
- 3. Adoption of the minutes from Leipzig, Germany (10 and 11 April 2008)**
- 4. Follow up on actions from the Leipzig meeting**
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- 2009 Q1/Q2: Switzerland
- 2009 Q3/Q4: Slovenia
- 2010 Q1/Q2: Bulgaria

MEETING QUESTIONS AND NOTES

1. OPENING OF THE MEETING

TAAM Minutes:

The delegates were welcomed to Edinburgh by the meeting chairman

2. ADOPTION OF THE AGENDA

TAAM Minutes:

The meeting Agenda was accepted as presented.

3. ADOPTION OF THE MINUTES FROM LEIPZIG, GERMANY (10 AND 11 APRIL 2008)

TAAM Minutes:

The minutes of the previous meeting held in Leipzig, Germany on 10-11 April were adopted without any changes.

4. ITEMS CARRIED OVER FROM THE LEIPZIG MEETING

4.1 (Leipzig Agenda Item 4.6): Motor Cycle Working Group and TAAM Quadricycle sub-group

1) Commission to report on progress made at September 2008 Motor Cycle Working Group meeting with proposals from TAAM Quadricycle sub-group

2) 2002/24/EC Status of Proposals from TAAM Quadricycle sub-group, Germany (Edinburgh Germany 5):

Question:

What is the actual state of implementing the proposed changes of the Quadricycle subgroup regarding the so called Go-Karts and Pocket Bikes?

Issue:

The German ministry of transport urged the KBA to make use of the proposed provisions of the subgroup when judging the application for an approval of the concerned vehicles. In other words: the KBA is actually issuing only an approval under the 2002/24/EC if the vehicles also comply with the subgroup results!

Germany would like to know two things:

1. Is any other TAA acting in the same way and
2. Is there an official proposal of the Commission for amending 2002/24/EC in the direction of the proposed changes by the subgroup or is there a fixed date for a MCWG meeting?

Possible solutions:

Selection of solution		accepted	refused
A	A WVTA for pocket bikes or Go-Karts (small quads) is only issued when the proposed provisions of the Quadricycle subgroup of the TAAM are fulfilled.		
B	The directive 2002/24/EC will be amended soon! (2009)		

TAAM Minutes:

The Commission confirmed that the TAAM group proposals would be discussed at the next meeting of the Motor Cycle Working Group which is scheduled for 20 October 2008. The TAAM delegates agreed to await the outcome of this MCWG meeting.

It was noted that, since the TAAM Quadricycle subgroup meeting in Ireland in April 2006, none of the TAAM delegates have actually issued an approval for the types of vehicle specific to this question.

4.2 (Leipzig Agenda Item 6.7): Commission to confirm legal position regarding manufacturers' representatives based in EFTA countries.

Solution A – as agreed at the previous TAAM (Leipzig, Germany)

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

TAAM Minutes:

The Commission confirmed that it had received an informal reply from the EC lawyers in support of the opinion expressed at the previous TAAM that the “manufacturer’s representative” may be established in the EEA EFTA States.

Official written confirmation is still awaited.

4.3 (Leipzig Agenda Item 7.9) (Coach steps/gangways/entrance door - Leipzig Romania 1): Romania to report on GRSG discussion (if appropriate)

Directive 2001/85/CE amended by 2006/96/CE

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)

Pict. no. 1



Uppermost step of the door aperture ?
or?



TAAM Minutes:

Further discussion confirmed that common agreement on one approach could not be reached. Romania will submit a proposal for revised text to GRSG.

**4.4 (Leipzig Agenda Item 10.5) (ECE R48 Contour Marking - Leipzig Netherlands 4):
Continued discussion**

v1.00 – 14 March 2008

Directive or Regulation number:

- ECE-R48

Subject:

Conspicuity markings

Reference to Annex, etc in the Directive or Regulation:

- 2.7.17.1.2: Partial contour marking

- 6.21: Conspicuity markings

Text:

Partial contour marking is mandatory on vehicles exceeding 6,000 mm in length (including the drawbar for trailers) and of the following categories:

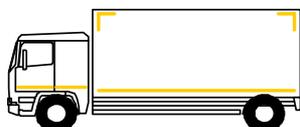
- (a) N2 with a maximum mass exceeding 7.5 tonnes and N3 (with the exception of chassis-cabs, incomplete vehicles and tractors for semi-trailers)
- (b) O3 and O4

Question:

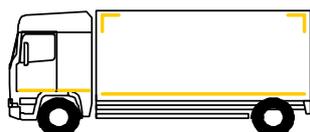
In case of a commercial vehicle, is it sufficient to indicate the vertical dimension only by marking the upper corners of the structure behind the cabin ? In other words exclude the cabin, similar to a tractor / semi-trailer combination ?

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	

TAAM Minutes:

The meeting supported the principle that, in respect of vehicle height, the marking should only be needed on the highest structure which, in some cases could be the bodywork behind the vehicle cab.

Netherlands will submit a proposal to GRE for an amendment to R48 to clarify the requirements in this respect.

4.5 (Leipzig Agenda Item 7.22) (Euro 5/6 vehicles emissions and data information - Leipzig Germany 5): Continued discussion

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		
B	The standard information for the OEM-dealer-workshops/garages are sufficient		
C	Only emission-/fuel consumption-relevant information will build the scope of necessary data. (As Annex XIV describes)		

Comment:

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

TAAM Minutes:

See notes for Item 5.1

5. ITEMS RELATING TO RECAST FRAMEWORK DIRECTIVE 2007/46/EC (MOTOR VEHICLES)

5.1 2007/46/EC: Access to repair and maintenance information, Spain 3

Issue: Access to vehicle repair and maintenance information

Legislation: Point 16 in Annex I of the Regulation

16. ACCESS TO VEHICLE REPAIR AND MAINTENANCE INFORMATION

16.1. Address of principal website for access to vehicle repair and maintenance information:

16.1.1. Date from which it is available (no later than 6 months from the date of typeapproval)

16.2. Terms and conditions of access to website:

16.3. Format of the vehicle repair and maintenance information accessible through website:

Question:

We would like to know how other MS will consider this point in the future. Any guidance would be very much appreciated.

TAAM Minutes:

Items 4.5 and 5.1 were considered together.

The Commission confirmed that the requirements in EC-Regulation 715/2007 (Annex XIV and Article 6) for access to vehicle repair and maintenance information applied to the full range of subjects required for European whole vehicle approval and not just to light duty emissions.

Whilst accepting this situation, several Member States considered that it would have been better to put specific requirements in the legislation for each of the relevant separate EC Type Approval subjects.

It was noted that declaration of compliance is an obligation on the manufacturer, not the Type Approval Authority, but manufacturers are expecting TAAs to advise. No TAA had sufficient experience at the time of the meeting and it was therefore suggested that the delegates share experiences at the next TAAM.

5.2 2007/46/EC Annex XVII: Multi-stage EC type approval, Netherlands 2

Directive or Regulation number:	
- 2007/46/EC	
Subject:	
WVTA; Multi-stage EC Type-Approval	
Reference to Annex, etc in the Directive or Regulation:	
- Annex XVII; Procedures to be followed during multi-stage EC Type-Approval 1 General 1.1	
Text:	
<i>The satisfactory operation of the process of multi-stage EC type-approval requires joint action by all the manufacturers concerned. To this end approval authorities must ensure, before granting first and subsequent stage approval, that suitable arrangements exist between the relevant manufacturers for the supply and interchange of documents and information such that the completed vehicle type meets the technical requirements of all the relevant regulatory acts as prescribed in Annex IV or Annex XI. Such information must include details of relevant system, component and separate technical unit approvals and of vehicle parts which form part of the incomplete vehicle but are not yet approved.</i>	
Question:	
What proof is required to be provided by the last stage (incomplete and completed vehicles) manufacturer to be in compliance with this requirement?	
Solutions:	
A	A signed contract between the manufacturers involved
B	A signed contract with the importer (not being the official representative) is also sufficient
C	Prove that the manufacturer can have access to the part Approvals of the previous stage(s)

TAAM Minutes:

Whilst the meeting fully agreed for the need for communication between the manufacturers involved in the different stages of multi-stage approvals there was some discussion about the exact arrangements needed.

Many delegates were in favour of a formal (signed) contract but others were concerned that some large first stage manufacturers might only be prepared to sign formal contracts with a limited number of approved second stage manufacturers - thereby putting many of the smaller subsequent stage manufacturers out of business.

The Commission explained that a guidance document was currently under preparation and all TAAM delegates were therefore invited to send comments to [redacted]

5.3 2007/46/EC Annex IX: Certificate of Conformity, Germany 4

Issue

Annex IX “CoC” of Directive 2007/46/EC

The new formats of the CoC for the different vehicle classes will be determined in the near future. KBA uses the CoC for all vehicle classes in an electronic xml-format for a data-base and data-exchange with the manufacturers. The electronic data are provided to the registration offices to fill out the registration documents easily and without mistakes.

KBA will have a lot of efforts for adopting format changes to the system. The changes cannot be done until 29th of April 2009.

Question:

Do other Type Approval Authorities also have high efforts and/or cannot reach the 29th of April 2009?

Prescription

Directive 2007/46/EC

Possibilities of solution

Comments

A	No , the planned changes are fine for us. No problem with effort and timeline.	
B	Yes , we also have problems to implement the changes in time.	

TAAM Minutes:

The key issue was identified as the lack of leadtime provided for potential implementation of the proposed CoC changes.

It was apparent that the proposed changes would impact most on Member States using CoC data within their vehicle registration systems but some delegates also reported concerns from vehicle manufacturers.

Delegates were requested to check if their respective Registration Authorities would have any problems with the implementation and report back (via email) accordingly.

Germany will present a proposal to CATP.

5.4 2007/46/EC: Acceptability of 2005/55/EC EU4 approvals , Spain 5

Question regarding existing types versus new types has arisen several times in the group. Now we have this problem with EU4 engines related to WVTA dates of application for M2 and M3 category vehicles (see below).



Question:

Is it possible to include EU4 engines in the first issue of the WVTA?

Possibilities of solution

Comments

	<u>Possibilities of solution</u>	<u>Comments</u>
A	Yes	
B	No.	

Comments:

What happens in case of a multistage approval if the engine coming from first stage is EU4 and a bodybuilder wants to apply for a second stage approval using a EU4 as a base vehicle?

TAAM Minutes:

The meeting agreed that solution A would be acceptable until 30 September 2009.

The meeting confirmed that the same would apply in the case of a multi-stage approval when the engine coming from first stage is approved to the EU4 level.

In addition, the end of series provisions will also apply.

It was noted that, following ongoing discussions from previous TAA meetings, it is now accepted that there can be a distinction between the type date for a systems approval and the type date for a corresponding whole vehicle approval.

Supplementary Notes:

LEGISLATION

Article 5 - Obligations of manufacturers

1. *The manufacturer is responsible to the approval authority for all aspects of the approval process and for ensuring conformity of production, whether or not the manufacturer is directly involved in all stages of the construction of a vehicle, system, component or separate technical unit.*
2. ***In the case of multi-stage type-approval, each manufacturer is responsible for the approval and conformity of production of the systems, components or separate technical units added at the stage of vehicle completion handled by him.***
The manufacturer who modifies components or systems already approved at earlier stages shall be responsible for the approval and conformity of production of those components and systems.
3. *For the purposes of this Directive, a manufacturer established outside the Community shall appoint a representative established in the Community to represent him before the approval authority.*

ANNEX XVII - PROCEDURES TO BE FOLLOWED DURING MULTI-STAGE EC TYPE-APPROVAL

1. GENERAL

- 1.1. *The satisfactory operation of the process of multi-stage EC type-approval requires joint action by all the manufacturers concerned. To this end approval authorities must ensure, before granting first and subsequent stage approval, that suitable arrangements exist between the relevant manufacturers for the supply and interchange of documents and information such that the completed vehicle type meets the technical requirements of all the relevant regulatory acts as prescribed in Annex IV or Annex XI. Such information must include details of relevant system, component and separate technical unit approvals and of vehicle parts which form part of the incomplete vehicle but are not yet approved.*
- 1.2. *EC type-approvals in accordance with this Annex are granted on the basis of the current state of completion of the vehicle type and must incorporate all approvals granted at earlier stages.*
- 1.3. ***Each manufacturer in a multi-stage EC type-approval process is responsible for the approval and conformity of production of all systems, components or separate technical units manufactured by him or added by him to the previously built stage. He is not responsible for subjects which have been approved in an earlier stage except in those cases where he modifies relevant parts to an extent that the previously granted approval becomes invalid.***

5.5 2007/46/EC: Maximum speed, Romania 3

Directive 2007/37/CE amending 70/156/CEE; directive 2007/46/CE

Subject: maximum speed

Fact: there is no remark to UN/ECE Regulation nr. 68 in the frame-work directives but they use the term of maximum speed.

Taking account the directive 2007/46 will be applied for all the vehicles and having a not very pleasant experience with the importers / manufacturers of special vehicles (such ambulances, fire fighting vehicles, police vehicles etc) we want to know the opinion of the SM concerning a directive which may establish provisions to measure the maximum speed for such vehicles (for „normal” M1 also, if it will be considered useful).

TAAM Minutes:

There is no EC Directive/Regulation procedure for certifying Maximum Vehicle Speed and any relevant type approval test criteria (e.g. brake testing at 80% maximum speed) are currently based on the manufacturer’s declared value.

It was apparent that no other delegates had a problem with this current situation.

5.6 2007/46/EC Annex II B: Definition of vehicle type (number of axles) Netherlands 3

Directive or Regulation number:	
- 2007/46/EG	
Subject:	
Definition Axle	
Reference to Annex, etc in the Directive or Regulation:	
Annex II, B point 4 Definition of vehicle type	
Text:	
<p>4. For the purpose of categories O1, O2, O3 and O4: A 'type' shall consist of vehicles which do not differ in at least the following essential respects:</p> <ul style="list-style-type: none"> — the manufacturer, — the manufacturer's type designation, — category, — essential aspects of construction and design: <ul style="list-style-type: none"> — chassis/self supporting body (obvious and fundamental differences), — number of axles, — drawbar trailer/semi-trailer/centre axle trailer, — type of braking system (e.g. unbraked/inertia/power). 	
Question:	
We see an axle as one axle, if it can move independent. Not to confuse with independent suspension of an axle. See pictures	
Solutions:	
A	- picture 1; has 6 axles at the rear - picture 2; has 3 axles at the rear
B	- picture 1; has 3 axles at the rear - picture 2; has 3 axles at the rear
C	- picture 1; has 6 axles at the rear - picture 2; has 6 axles at the rear

Picture 1: independent axles



Picture 2: Independent suspension



TAAM Minutes:

The meeting supported Solution B.

In reaching this conclusion it was noted that the independent front wheels on a typical rear wheel drive car (or independent rear wheels on a typical front wheel drive car) would always be considered to represent one single axle.

The meeting also noted that Solutions A and C would have implications for road loading.

5.7 2007/46/EC Annex IX: Range of data on Certificate of Conformity, Spain 2

Question:

Manufacturers are always keen of having ranges in COC whilst administrations are reluctant, but there are several cases in which some difficulties may be found. As an example, in most of the cases an incomplete M3-vehicle is sold to the bodybuilder with what is called a “transport chassis” that would not be in its definitive masses (including axles distribution) neither its dimensions (bodybuilder will stretch it). In these cases, would a range of data on the COC be acceptable?

Possibilities of solution

Comments

	A Yes	
	B No.	

Comment:

Using point 50 (Remarks) to write down “Transport chassis” on it, would be of any help?

TAAM Minutes:

For vehicle registration purposes the meeting was in favour of fixed data specific to that particular vehicle (rather than a range of data) to be shown on the relevant vehicle’s Certificate of Conformity.

However, in the case of a ‘transport chassis’ which would not need registration until the final completed vehicle stage, there was a general view it could be acceptable for the CoC for the incomplete stage to show a range of mass and dimension values.

It was suggested that, in these cases, a comment could be included the remarks section to identify the incomplete vehicle as a transport chassis (see 2007/46/EC Annex IX, Part II for M2/M3 vehicles, Item 50).

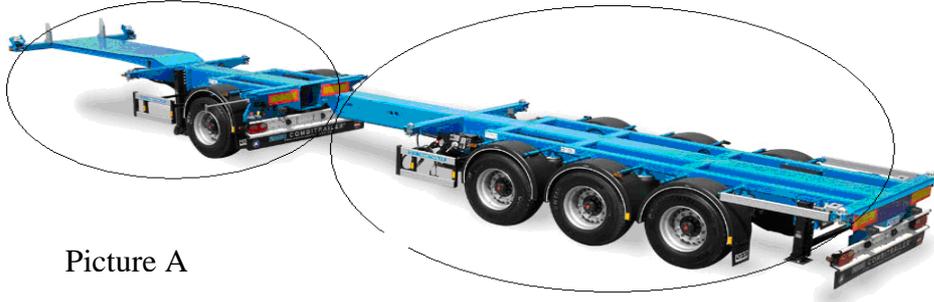
The specific mass and dimension data for the finished vehicle would then be quoted in the CoC for the final completed vehicle specification (see 2007/46/EC Annex IX, Part I for M2/M3 vehicles).

It was noted that good exchange of information between the different stage manufacturers would be required to ensure compatibility between the mass and dimension data for the completed vehicle and the design limits for the individual components used (e.g. axles, brakes etc).

The delegates from the Netherlands reserved their position on this point pending further discussions in Brussels.

5.8 2007/46/EC, Annex II B: Definition of vehicle type (O Category), Netherlands 4

Directive or Regulation number:		
- 2007/46/EG		
Subject:		
Definition of vehicle type for the purpose of categories O4:		
Reference to Annex, etc in the Directive or Regulation:		
Annex II, C point 4		
Text:		
A 'type' shall consist of vehicles which do not differ in at least the following essential respects:.....		
Question:		
We would like to know the opinion of the other TAAM members concerning the possibility to grant a type approval or type approvals of this vehicle concept.		
Pictures:		
A	2 separated type-approvals for semi-trailers	
B	1 type-approval for semi-trailer (1 axle) + 1 type-approval for semi-trailer (combination connected 4 axles minus 1 lifted is 3 axles)	
C	1 type-approval for semi-trailer (3 axles for the connected vehicles)	



Picture A



Picture B



Picture C

TAAM Minutes:

It was explained that this trailer combination could be used as follows:

- 1) Front part only as a single axle trailer (possibly for carrying a container)**
- 2) Front and rear part combined as a rigid assembly. In this case the front axle would lift and the resulting trailer would be operated as a 3 axle unit**

There would not be a situation when the rear trailer section would be used on its own without first being connected with the front section.

Some delegates felt that this trailer combination should be covered by the 8.2.(c) procedure but others did not share this view and no overall consensus could be achieved.

Issue: Bi-articulated bus to be a variant to articulated despite more axles

Legislation: 2007/46 EC Annex II, part B: Definition of vehicle type

2. For the purpose of categories M₂ and M₃:

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

the manufacturer,

the manufacturer's type designation,

category,

essential aspects of construction and design:

chassis/self-supporting body, single-/double deck, rigid/articulated (obvious and fundamental differences),

number of axles,

power plant (internal combustion/electric/hybrid),

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

class as defined in Directive 2001/85/EC of the European Parliament and of the Council of 20 November 2001 relating to special provisions for vehicles used for the carriage of passengers comprising more than eight seats in addition to the driver's seat¹ (only for complete vehicles),

extent of build (e.g. complete/incomplete),

power plant:

working principle (as in item 3.2.1.1 of Annex III),

number and arrangement of cylinders,

power differences of more than 50 % (the highest is more than 1,5 times the lowest),

capacity differences of more than 50 % (the highest is more than 1,5 times the lowest),

location (front, mid, rear),

technically permissible maximum laden mass differences of more than 20 % (the highest is more than 1,2 times the lowest),

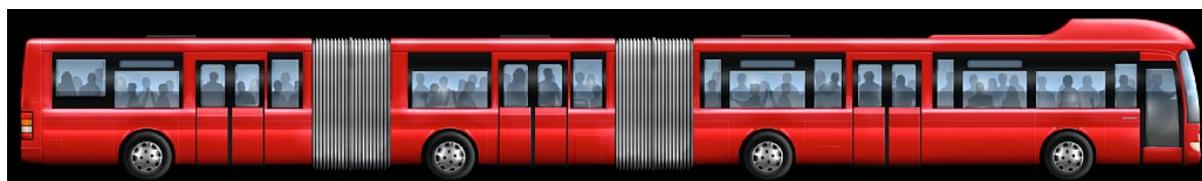
powered axles (number, position, interconnection),

steered axles (number and position).

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

Question:

Definition of type in directive is clear but, could a bi-articulated bus be considered as a variant of a single-articulated one without considering the number of axles? (See pictures below)



Possibilities of solution

Comments

A	Yes, it is acceptable.	Vehicles are the same except for their dimensions and number of axles.
B	No it is not acceptable.	Directive text is clear.

TAAM Minutes:

The meeting considered that the current text is clear and therefore supported Solution B.

5.10 2007/46/EC Article 5: manufacturer’s representative, Germany 2

Issue

Article 5 “**Obligations of manufacturers**” Section 3. of Directive 2007/46/EC reads:

“For the purpose of this Directive, a manufacturer established outside the Community shall appoint a representative established in the Community to represent him before the approval authority.”

Question:

What exactly does „For the purpose of this Directive“ mean? Is an applicant who applies for a type approval for a system, a component or a separate technical unit obliged to appoint a representative?

Prescription

Directive 2007/46/EC

Possibilities of solution

Comments

A	Yes , a company established outside the Community that applies for a type approval for a system, a component or a separate technical unit is - as well as a company that applies for a whole vehicle type approval according to Directive 2007/46/EG - obliged to appoint a representative.	Regarding to a lot of systems, components or separate technical units the applicant is in a position to decide for an approval according to an EC Directive or to an ECE Regulation. There is no cause in the ECE Regulations that obliges any applicant to appoint a representative.
B	No , a company established outside the Community that applies for a type approval for a system, a component or a separate technical unit is not obliged to appoint a representative.	

TAAM Minutes:

It was noted that Article 5 Section 3 relates to legal traceability and accountability within the EC.

The meeting confirmed that Article 5 applies to all system, component, and whole vehicle approvals (i.e Solution A)

5.11 2007/46/EC Article 22: EC Small Series, Netherlands 1, UK 2 and Germany 7

Netherlands 1

Directive or Regulation number:	
- 2007/46/EC	
Subject:	
Small series	
Reference to Annex, etc in the Directive or Regulation:	
- Annex IV, appendix 1; small series 14. Protective steering	
Text:	
<i>C: The manufacturer has to demonstrate to the satisfaction of the approval authority that the essential requirements of the regulatory act are fulfilled.</i>	
Question:	
<p>Nowadays the testing in paragraph 5.1. of Annex I (flat barrier test; 74/297/EEC) is not performed anymore, due to the frontal off set testing in accordance with 96/79/EC. According to point 53 in Directive 2007/46, Annex IV appendix, Directive 96/79/EC is not applicable to small series. Does this mean that proof must be given that the vehicle built in small series fulfils the requirements of paragraph 5.1. of Annex I (Directive 74/297/EEC)</p>	
Solutions:	
A	yes proof must be presented by the manufacturer that the essential requirements of the regulatory act are fulfilled
B	no, the vehicles built in small series are exempted from full scale crash testing

RECAST EC WHOLE VEHICLE FRAMEWORK DIRECTIVE

2007/46/EC ANNEX IV APPENDIX TO PART 1: M1 SMALL SERIES TECHNICAL REQUIREMENTS

BACKGROUND

Recast Framework Directive 2007/46/EC introduces an opportunity for European Small Series approval for M1 vehicles. The technical requirements are identified in the Appendix to Annex IV Part 1 and, whilst for some subjects (typically the component approvals) a full European approval is required, for many 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 those subjects marked with classifications X, A and B, the manufacturer must meet the full technical requirements of the respective legislation and the difference between them is related to the amount of documentation and the amount of witnessed testing required.

For those 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.

Given that the sequence of the classifications (X, A, B, C and N/A) provides a progressive reduction in the regulatory burden for the vehicle manufacturer, a key issue is to try to clarify and differentiate between the intended meanings of the 'B' and 'C' classifications.

It is intended that a Working Group be established at EC level to agree a set of subject-by-subject guidelines in order to ensure consistency of approach between different Member States.

However, in view of the relatively limited time available (European M1 Small Series Approvals can be issued from April 2009), and pending guidance from an EC Working Group, a TAAM discussion was initiated established at the Leipzig TAAM (April 2008).

DISCUSSION

The purpose of this paper is to promote continued discussion and thereby explore opportunities for a common approach to granting approval for subjects that have been allocated a 'C' classification.

Please note that the suggested acceptance criteria shown below are not firm proposals but are simply included to encourage discussion during the meeting:

Item 5: Steering Effort

Full Technical Requirements

- Limit for effort required at steering wheel rim when conducting prescribed manoeuvres (with power assistance in both operational and failed condition)
- Requirements for safe handling/behaviour of steering up to vehicle's max speed
- General requirements for robust construction of steering system

Possible Acceptance Criteria

Limit value for steering torque for half turn of steering wheel at vehicle speed of 10 km/h with power failed.

+++++

Item 6: Door Latches & Hinges

Full Technical Requirements

- General requirements for design and functionality of door latches and hinges
- Strength test for latches
- Strength test for hinges
- Entry/exit step height requirement

Possible Acceptance Criteria

Carryover door locks and hinges from vehicle with full EC approval

+++++

Item 10: EMC (Radio Suppression)

Full Technical Requirements

- Approval based either on
 - Separate approvals for all electrical/electronic systems or electrical sub assembliesor
 - Vehicle tests
- The vehicle tests cover Broadband Emissions, Narrowband Emissions and Immunity

Possible Acceptance Criteria

Evidence of component testing but no 'e mark' required

+++++

Item 12: Interior Fittings

Full Technical Requirements

- Radii and protrusion requirements for switches, controls and general interior fittings
- Requirements specified for designated sections of the interior (upper dashboard, lower dashboard, roof, rest of vehicle interior etc)
- Impact tests requirements for upper dashboard (head impact zone) and other items (including the rear parts of seats)
- Specific requirements for safe operation of electric windows

Possible Acceptance Criteria

Radii and protrusion requirements for switches, controls and general interior fittings but no impact tests

+++++

Item 14: Protective Steering

Full Technical Requirements

- Barrier Impact test (not required if Vehicle also approved to 96/79/EC)
- Body block impact against steering wheel
- Head impact against steering wheel

Possible Acceptance Criteria

No barrier test - steering column linkage design with joints/collapsible sections to ensure that any rearward movement of steering system does not directly result in rearward movement of the steering column.

Body block and head impact tests not required if the steering wheel is fitted with an airbag

+++++

Item 15: Seat Strength

Full Technical Requirements

- Strength tests for seat backrest and headrest
- Dynamic sled test to check security of seat mounts in vehicle floor and to check security of seat adjustment/locking mechanisms
- Impact test for headrests and rear parts of seats
- Radius requirements for rear parts of seats
- Dimensional requirements for headrest

Possible Acceptance Criteria

Dimensional and radii checks
Backrest/headrest strength test
No sled test, no impact tests

+++++

Item 16: Exterior Projections

Full Technical Requirements

- Radius requirements for contactable surfaces
- Specific radii and protrusion requirements for specific items (e.g. door handles, fuel caps, hinges, bumpers, wheels etc)

Possible Acceptance Criteria

Radius check only, no restriction on protrusions

+++++

Item 34: Defrost Demist

Full Technical Requirements

- Cold chamber test (-8 °C. or -18 °C) to measure time to clear ice from windscreen (in specified A and B vision zones)
- Cold chamber test (-3 °C) to measure time to clear steam/mist from windscreen (in specified A and B vision zones)

Possible Acceptance Criteria

No performance tests

Vehicle must be fitted with windscreen defrost/demist system, i.e.:

- Warm air ducted to windscreen (with fan assistance)

or

- Vehicle fitted with electrically heated screen

+++++

Item 35: Wash/Wipe

Full Technical Requirements

- Specifications for operation of windscreen wipers in terms of operating frequencies, stall, auto-park and swept area (in relation to specified A and B vision zones)
- Cold chamber test to check performance at -18 °C
- High speed performance check
- Specification and performance criteria for windscreen washer systems

Possible Acceptance Criteria

Vehicle must be fitted with a windscreen wipers and washers

No specific performance criteria

+++++

Item 36: Heating Systems

Full Technical Requirements

- Requirement for all vehicles to be specified with a heater for the vehicle interior of the vehicle
- The heated air entering the passenger compartment shall be no more polluted than the air at the point of inlet to the vehicle
- The vehicle occupants must not be able to come into contact with parts of the vehicle (or heated air) liable to cause burns
- The exhaust emissions from combustion heaters must be within acceptable limits.

Possible Acceptance Criteria

Vehicle must be fitted with heater in passenger compartment

No danger of polluted air entering passenger compartment from heating system

+++++

Item 40: Engine Power

Full Technical Requirements

- Engine bench test to determine engine net power curve
- Measured results to be within 2% of manufacturer's declared value for maximum power at declared engine speed (4% at all other speeds)

Possible Acceptance Criteria

Manufacturers own test data accepted

+++++

Item 44: Masses & Dimensions

Full Technical Requirements

- Mass checks to verify that fully loaded vehicle (including tow bar load, when applicable) does not exceed stated maximum axle and gross vehicle masses
- Measurement of vehicle's overall dimensions

Possible Acceptance Criteria

Manufacturers own data accepted without further test

+++++

LEGISLATION

Article

22

EC type-approval of small series

- 1. *At the request of the manufacturer and within the quantitative limits set out in Section 1 of Part A of Annex XII, Member States shall grant, in accordance with the procedure referred to in Article 6(4), an EC type-approval in respect of a type of vehicle which satisfies at least the requirements listed in the Appendix to Part I of Annex IV.*

ANNEX XII

SMALL SERIES AND END-OF-SERIES LIMITS

A. SMALL SERIES LIMITS

- 1. *The number of units of one type of vehicle to be registered, sold or put into service per year in the Community in application of Article 22 shall not exceed the figures shown below for the vehicle category in question:*

Category	Units
M ₁	1 000
M ₂ , M ₃	0
N ₁	0
N ₂ , N ₃	0
O ₁ , O ₂	0
O ₃ , O ₄	0

Article

18

Certificate of conformity

- 1. *The manufacturer, in his capacity as the holder of an EC type-approval of a vehicle, shall deliver a certificate of conformity to accompany each vehicle, whether complete, incomplete or completed, that is manufactured in conformity with the approved vehicle type.
In the case of an incomplete or completed vehicle, the manufacturer shall complete only those items on side 2 of the certificate of conformity which have been added or changed at the current stage of approval and, if applicable, shall attach to the certificate all certificates of conformity delivered at the previous stage.*
- 6. *The certificate of conformity, as set out in Part I of Annex IX for vehicles type-approved in accordance with Article 22 shall display in the title thereof the phrase "For complete/completed¹ vehicles type-approved in small series", and in close proximity thereto the year of production followed by a sequential number, between 1 and the limit indicated in the table set out in Annex XII, denoting, in respect of each year of production, the position of that vehicle within the production allocated for that year.*

		<u>Germany 7</u>		Methods to demonstrate the essential requirements by manufacturers					Performing of inspections and preparation of technical reports			
	No.	Approval object	Legal act	Essential requirements (as required in legal acts)	practical test of essential requirements	Calculation and/or virtual test and/or CAD-proof	Adoption of approved parts (comparable installation)	Manufacturer's confirmation	EC-Approval	Manufacturer (Aptitude for self-testing proven)	Technical Service (designated by TAA)	
A	Full compliance with legal act	general									X	
B	Full compliance but self test	general								X	X	
C	Demonstrate that essential requirements are fulfilled	5. Steering effort	70/311/EEC	General requirements for robust construction	X		X			X	X	
				Requirements for safe handling	X (driving test)					X	X	
				Limited steering forces (intact/defect)	X (test)					X	X	
		6. Door latches and hinges	70/387/EEC	latches (longitudinal- and transverse load)	X	X	X		X	X	X	
				latches (inertia load)	X	X	X		X	X	X	
				hinges (longitudinal- and transverse load)	X	X	X		X	X	X	
		10. Suppression (radio)	72/245/EEC	Emissions	X		X		X	X	X	
				Immunity	X		X		X	X	X	
		12. Interior fittings	74/60/EEC	head-impact zone	X	X	X		X	X	X	
				measuring of protrusions and radii	X	X	X		X	X	X	
				safe operation of power-operated parts	X	X	X		X	X	X	
		14. Protective steering	74/297/EEC	back shifting of steering	X	X	X		X	X	X	
				head impact on steering-system (Head form)	X		X		X	X	X	
				chest impact on steering-system (Bodyblock)	X		X		X	X	X	
		15. Seat strength	74/408/EEC	arrangement and function of adjustment/locking systems	X (vehicle and vehicle part)	X (vehicle)	X (vehicle part)				X	X
				head impact on seat back							X	X
				strength of seat anchorage and adjustment/locking systems							X	X
				strength of the seat backrest							X	X
				requirements on head restraints							X	X
16. Exterior projections	74/483/EEC	general requirements, radii, protrusions, grills, wipers, handles, hinges, fuel tank filler applications, convertible roofs, etc. according to numeration anxi cipher 6ff	X	X					X	X		
34. Defrost/Demist	78/317/EEC	determining vision areas	X	X	X				X	X		
		defrosting of CTC	X	X	X				X	X		
		demisting of CTC	X	X	X				X	X		
35. Wash/Wipe	78/318/EEC	determining vision areas	X	X					X	X		
		sweep frequencies (also CTC)	X	X	X				X	X		
		cleaning efficiency during high speed	X						X	X		
		test of windscreen-washers (CTC)	X	X	X				X	X		
36. Heating system	2001/56/EC	engine waste heating	X	X	X		X		X	X		
		combustion heaters	X	X	X		X	X	X	X		
		test of installation of combustion heaters	X	X	X		X	X	X	X		
40. Engine power	80/1269/EEC	determination of power and torque	X		X				X	X		
44. Masses and dimensions (cars)	92/21/EC		X	X					X	X		
		EC-type approval (whole vehicle test report)								X		

TAAM Minutes:

The meeting agreed that there is scope within the wording for significant variations in interpretation between different Type Approval Authorities and it was agreed that, in the interests of harmonisation, there should be a co-ordinated approach.

Noting that EC Small Series approvals can be issued from April 2009 (and hence it would not be practical to wait until the next TAAM) it was agreed that the Edinburgh TAAM Secretary would co-ordinate responses from all interested parties during November and December and thereby prepare set of co-ordinated proposals for circulation to all TAAM members. The objective would be to have the co-ordinated proposals available by mid January 2009.

The Chair suggested that the delegates use the format of the Germany 7 spreadsheet as the template for their responses.

6. ITEMS RELATING TO CURRENT FRAMEWORK DIRECTIVE 70/156/EEC (MOTOR VEHICLES)

6.1 70/156/EEC: Certificate of Conformity, Romania 2

1.2 Directive 2007/37/CE amending 70/156/CEE; directive 2007/46/CE

1.2.1 Subject: Certificate of conformity

Fact: One of the European manufacturers issues the C.o.C. as following:

The WVTA certificate is, for instance, at the extension number 19. The C.o.C. for a specific type / variant / version vehicle leaving today on the production line will be issued in, let's say, two weeks bearing as extension number 8 and, of course, the present day as date of manufacturing. The explanation received from the manufacturer is: this type / variant / version complies with the description from the extension 19 but it hasn't been modified since it was launched in production by extension 8 so it complies also with the extension 8 and this extension must appear in the C.o.C.

Question: is such a certificate of conformity acceptable?

TAAM Minutes:

It was explained that a particular variant/version was covered by Extension 8 and subsequent extensions covered other variants/versions.

The meeting agreed that, provided the Extension 8 approval was still valid in respect of current legislation, it would be acceptable to quote the Extension 8 approval on a Certificate of Conformity.

6.2 70/156/EEC: Tyres shown on Certificate of Conformity, Slovenia 3

- Regulation number :

Directive 70/156/EEC amended 2001/116/EC relating to Whole Vehicle Type Approval

- Issue

In the Certificate of Conformity there are only specific tyres allowed-type approved for a specific variant of the vehicle. Do you allow any other alternative dimensions of tyres, as the manufacturers of tyres allow the tolerance for the circumference in the area from -2.5% up to 1.5%?

Possibilities of solution

Comments

	<u>Possibilities of solution</u>	<u>Comments</u>
<input type="checkbox"/>	A We accept the tolerance area.	
<input type="checkbox"/>	B We do not accept the tolerance area.	

TAAM Minutes:

The meeting confirmed that the tyre size quoted on the Certificate of Conformity must be one of the sizes listed in the approval documentation.

6.3 70.156/EEC: Approval numbering for vehicle systems Directives and Regulations, UK 1

70/156/EC EC WHOLE VEHICLE FRAMEWORK DIRECTIVE

APPROVAL NUMBERING FOR SYSTEMS DIRECTIVES/REGULATIONS

ISSUE

The current Framework Directive (70/156/EC) and the recast Framework (2007/46/EC) both state that when a separate Directives/Regulations contains different implementation dates referring to different technical standards, an alphabetical character shall be included in the approval number to specify the standard to which the approval was granted.

The subjects to which this could apply are typically Emissions related but there are also phased implementation dates for different technical standards within the legislation covering Pedestrian Protection and Mobile Air Conditioning.

However, whilst the Directives covering Emissions typically provide a clear explanation of the approval number format to provide identification of the technical standard achieved, the Directives for Pedestrian Protection (2003/102/EC) and Mobile Air Conditioning (2006/40/EC) do not include any specific provisions.

DISCUSSION

VCA’s opinion is that we should follow the procedure laid down in the Framework Directives and hence, for example, an approval for a Mobile Air Conditioning system approved under the first phase of technical requirements (i.e. the system contains fluorinated greenhouse gases with a global warming potential higher than 150) should have an approval number as follows:

e11*2006/40*706/2007A*1234*00

However, we want to ensure that our approach is consistent with that used by the other Authorities.

QUESTION

An approval for a Mobile Air Conditioning system approved under the first phase of technical requirements (i.e. the system contains fluorinated greenhouse gases with a global warming potential higher than 150) should have an approval number as follows:

Possibilities of solution

Comments

	A	e11*2006/40*706/2007A*1234*00	This is in line with the provisions of Annex VII to current Framework Directive 70/156/EC (as amended) and also takes into account the provisions of Annex VII to Recast Framework Directive 2007/46/EC (with proposed amendments)
	B	e11*2006/40*706/2007*1234*00	There are no specific provisions within 2006/40/EC to cover identification of the different technical standards

TAAM Minutes:

It was confirmed that the provisions of the Framework Directives should be followed and, in respect of 2006/40/EC approval numbering, the meeting agreed as follows:

- The third section should refer to Commission Regulation (EC) No 706/2007 because this Regulation lays down measures for implementing Articles 4 and 5 of Directive 2006/40/EC.
- An alphabetical character should also be added to the third section to specify to which standard the approval was granted.

The meeting therefore supported Solution A

The Commission will now consider how to circulate information in support of this approach together with confirmation of the alphabetical character(s) to be used.

Supplementary Notes:

Legislation:

A. Framework Directive 70/156/EC, as amended, makes provision for approval numbering as follows:

Annex VII - EC Type-Approval Certificate Numbering System

1. *The EC type-approval number shall consist of four sections for whole vehicle type-approvals and five sections for system, component, and separate technical unit type-approvals as detailed below. In all cases, the sections shall be separated by the “*” character.*
 - Section 1: *The lower case letter “e” followed by the distinguishing number of the Member State issuing the EC type-approval:*
 - Section 2: *The number of the base Directive or Regulation.*
 - Section 3: *The number of the latest amending Directive or Regulation applicable to the EC type-approval.*
 - *In the case of whole vehicle EC type-approvals, this means the latest Directive amending an Article (or Articles) of Directive 70/156/EEC.*
 - *Means the latest Directive containing the actual provisions with which the system, component or technical unit conforms.*
 - ***Should a Directive contain different implementation dates referring to different technical standards, an alphabetical character shall be added to specify to which standard the approval was granted.***
 - Section 4: *A four-digit sequential number for EC whole vehicle type-approvals, or four or five digits for EC type-approval pursuant to a separate Directive or Regulation to denote the base type-approval number.*
 - Section 5: *A two-digit sequential number (with leading zeros if applicable) to denote the extension. The sequence shall start from 00 for each base approval number.*

B. Annex V of Proposed amendment to Recast Framework Directive 2007/46/EC

'ANNEX VII

EC TYPE-APPROVAL CERTIFICATE NUMBERING SYSTEM'

1. The EC type-approval number shall consist of four sections for whole vehicle typeapprovals and five sections for system, component, and separate technical unit typeapprovals as detailed below. In all cases, the sections shall be separated by the "*" character.

Section 1: The lower case letter "e" followed by the distinguishing number of the Member State issuing the EC type-approval:

Section 2: The number of the base directive or regulation.

*Section 3: The number of the latest amending directive or regulation **including implementing acts applicable to the type-approval.***

– In the case of whole vehicle type-approvals, this means the latest directive or regulation amending an Article (or Articles) of Directive 2007/46/EC.

– In the case of whole vehicle type-approvals granted in accordance with the procedure described in Article 22, this means the latest directive or regulation amending an Article (or Articles) of Directive 2007/46/EC, except that the two first digits (e.g. 20) are replaced by the letters KS in block capitals.

– This means the latest directive or regulation containing the actual provisions with which the system, component or technical unit conforms.

*– **Should a directive or regulation including their implementing acts contain different technical prescriptions to be applied from specific dates, Section 3 shall be followed with an alphabetical character to clearly identify against which technical prescriptions the approval was granted. When different vehicle categories are concerned, the character may also refer to a specific vehicle category. The alphabetical character shall be separated from the number by the character "*".***

Section 4: A four-digit sequential number (with leading zeros as applicable) for EC Whole vehicle type-approvals, or four or five digits for type-approval pursuant to a separate directive or regulation to denote the base typeapproval number. The sequence shall start from 0001 for each base directive or regulation.

Section 5: A two-digit sequential number (with leading zeros if applicable) to denote the extension. The sequence shall start from 00 for each base

6.4 78/549/EEC: Definition of snow chains, Germany 3

Issue:

In paragraph 3 of Annex I of directive 78/549/EEC it reads that the use of snow chains must be possible on defined vehicles. The meaning of “snow chains” is not defined within this directive. There are different kinds of snow chains and other systems (such as e.g. “spike-spider”) available on the market.

Are there any special definitions or provisions for a “snow chain” in other member states ?

Germany's opinion is, that there should be a definition within the directive!

Possible solutions:

Selection of solution		accepted	refused
A	A definition of the term “snow chain” should be added to the directive		
B	A definition of the term “snow chain” is not required within the directive		

TAAM Minutes:

With the support of the Commission, the meeting agreed that the words ‘snow chain’ can be interpreted to mean ‘snow chain or equivalent system’.

On this basis it was accepted that there is no need for a change to the wording of the legislation.

Supplementary Notes:

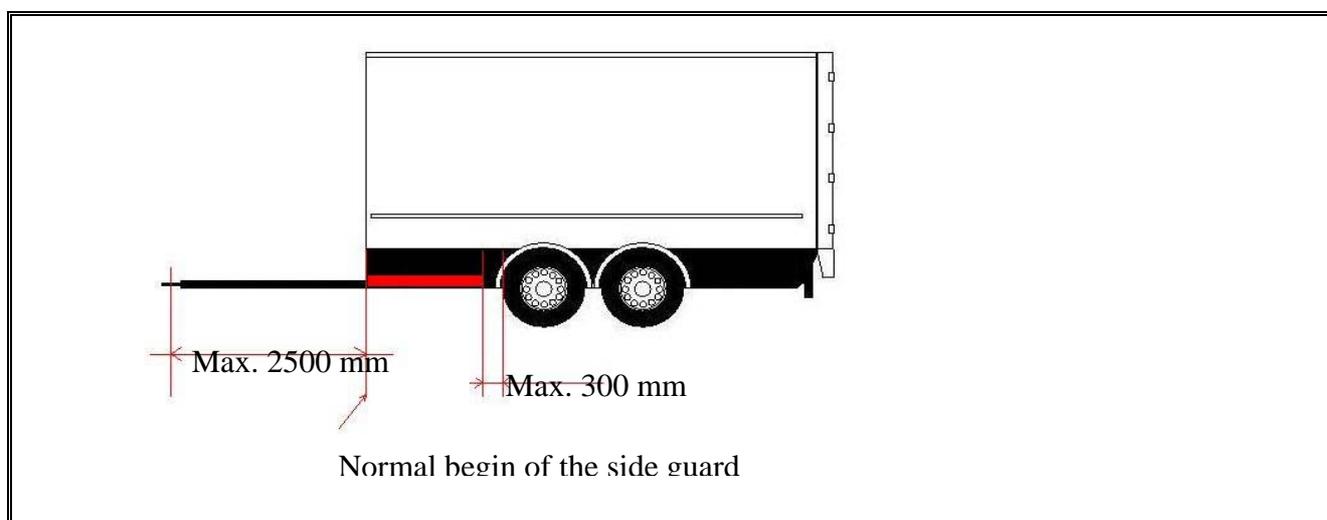
89/297/EEC

ANNEX - TECHNICAL REQUIREMENTS FOR LATERAL PROTECTION

1. *General prescriptions and definitions*
 - 1.1. *Every vehicle of categories N₂, N₃, O₃ and O₄ shall be so constructed and/or equipped as to offer, when a complete entity, effective protection to unprotected road users (pedestrians, cyclists, motorcyclists) against the risk of falling under the sides of the vehicle and being caught under the wheels ⁽¹⁾.*
The Directive does not apply to:
 - *tractors for semi-trailers,*
 - *trailers specially designed and constructed for the carriage of very long loads of indivisible length, such as timber, steel bars, etc.,*
 - *vehicles designed and constructed for special purposes where it is not possible, for practical reasons, to fit such lateral protection.*
 - 1.2. *A vehicle shall be deemed to satisfy the requirement set out in point 1.1 if its side parts provide protection conforming to the provisions of the paragraphs below.*

6.5 89/297/EEC: Central axle trailers and side guards, Netherlands 5

Directive or Regulation number:	
- 89/297/EEC	
Subject:	
Central axle trailers and side guards	
Reference to Annex, etc in the Directive or Regulation:	
- 2.4.1 – 2.4.1.3	
Text:	
2.4. The forward edge of the side guard shall be constructed as follows:	
2.4.1. Its position shall be:	
2.4.1.1. on a motor vehicle: not more than 300 mm to the rear of the transverse vertical plane tangential to the rearmost part of the tyre on the wheel immediately forward of the guard;	
2.4.1.2. on a drawbar trailer: not more than 500 mm to the rear of the plane defined in point 2.4.1.1.;	
2.4.1.3. on a semi-trailer: not more than 250 mm to the rear of the transverse median plane of the support legs, if support legs are fitted, but in any case the distance of the front edge to the transverse plane passing through the centre of the kingpin in its rearmost position may not exceed 2,7 m.	
Question:	
What is the position of the forward edge of the side guard on central axle trailers (category O3-O4)?	
Solutions:	
A	there must be lateral protection as described in point 2.4.1.3; Only the 2,7 m is the starting-point of the side guard.
B	Not more than the front of the bodywork, but in any case the distance of the front edge to the transverse plane passing through the centre of the coupling in its rearmost position may not exceed 2,5 m
	Se sketch under remarks



TAAM Minutes:

The meeting agreed that, although 89/297/EEC Section 2.4.1. does not specifically address centre axle trailers, the Directive does require lateral protection on all O3 and O4 trailers and the nearest equivalent configuration would be a semi-trailer.

There was support for the opinion that whilst a side guard should be fitted in the area ahead of the centre axle, there would be no need for it to extend forward of the front of the bodywork.

Supplementary Notes:

89/297/EEC

ANNEX - TECHNICAL REQUIREMENTS FOR LATERAL PROTECTION

1. General prescriptions and definitions

1.1. Every vehicle of categories N₂, N₃, O₃ and O₄ shall be so constructed and/or equipped as to offer, when a complete entity, effective protection to unprotected road users (pedestrians, cyclists, motorcyclists) against the risk of falling under the sides of the vehicle and being caught under the wheels ⁽¹⁾.

The Directive does not apply to:

- tractors for semi-trailers,
- trailers specially designed and constructed for the carriage of very long loads of indivisible length, such as timber, steel bars, etc.,
- vehicles designed and constructed for special purposes where it is not possible, for practical reasons, to fit such lateral protection.

1.2. A vehicle shall be deemed to satisfy the requirement set out in point 1.1 if its side parts provide protection conforming to the provisions of the paragraphs below.

6.6 Commission Regulation 692/2008: Test for compliance with in-use performance requirements, European Commission 1

1. Question relating to the Euro 5/6 Regulation No. 692/2008 1.1 Test for Compliance with In-Use-Performance Requirements

Annex XI, Appendix 1 of Regulation 692/2008 (Euro 5/6) stipulates minimum frequencies for the functioning of the OBD system under normal conditions of use from 2011 onwards, the so-called "in-use-performance ratios (IUPR)", which are applicable statistically to each OBD vehicle family of a manufacturer (i.e. individual vehicles may under-perform IUPR requirements).

Due to their very nature IUPR can not be assessed at the moment of type approval but have to be certified by the manufacturer as a condition for type approval and will then have to be demonstrated on the vehicle fleet when it is in-service. The details of the underlying tests are not legally defined yet, it is however the intention of the Commission and Member States to follow the respective statistical test developed by CARB, which demonstrates in case of failure with a high probability (e.g. 90%) that the IUPR requirements do not hold for the fleet.

A recent proposal wants to integrate the respective IUPR test into the well-known in-service conformity test, which is described for tailpipe emissions in Annex II of Euro 5/6 Regulation 692/2008. The in-service conformity test currently relies in its first stage on data to be supplied by manufacturers, i.e. the manufacturer is the "master of the game" for the selection of vehicles and evaluation of test data. Shortcomings, whether by insufficient methodology or introduced on purpose, are quite difficult to detect at the audit that has to be performed by the type approval authority. In a recent meeting of OBD experts government representatives were quite sceptical about the general quality and reliability of current in-service conformity tests for tailpipe emissions, which is supported by the fact that non-compliance (with tailpipe emission requirements) in the past was rarely, if ever detected by these tests.

While tailpipe emissions are assessed at the type 1 test of the type approval, there is no such correspondent for IUPR requirements. The assessment of compliance with IUPR requirements only relies on the ex-post statistical test. Therefore it was suggested that (contrary to the in-service conformity test for tailpipe emissions) the statistical IUPR test would be performed by type approval authorities at the first place, i.e. type approval authorities would select vehicles and evaluate respective data. It goes without saying that this test, although it takes place after the issue of the type approval, would be an integral part of the type approval procedure and manufacturers would have to bear the associated costs. Type approval authorities are therefore asked to respond the following questions:

- a) How do TAA consider the current quality and reliability of in-service conformity test data provided by manufacturers?
- b) Would TAA support the idea of performing the statistical IUPR tests themselves instead of the manufacturers?
- c) If yes, would TAA have the necessary competencies and resources?
- d) Should a stronger responsibility for type approval authorities regarding tailpipe emission in-service conformity tests be considered as well?

1.2 Table 1 of Appendix 6 of Annex 1 of Regulation 692/2008

This table attributes suffix letters (A, ..., Y) to the various stages of type approvals (e.g. Euro 5, Euro 6-,...) and indicates implementation dates, partially summarising information distributed elsewhere in Regulations 715/2007 and 692/2008. Manufacturers complain that the table is not clear enough and lacks certain information on the "last date of type approval" possible for the different stages. Type approval authorities are requested

- (1) To scrutinise the table for lack of clarity and (possible) genuine mistakes
- (2) Propose modifications to its format so that it may better suit the needs of their daily work

Any suggestions for this table, if considered appropriate, could be introduced with the next Comitology procedure amending Regulation 692/2008 by end of 2008 / beginning 2009.

ANNEX

Appendix 6

EC Type –Approval Certification Numbering System

1. Section 3 of the EC type-approval number issued according to Article 6(1) shall be composed by the number of the implementing regulatory act or the latest amending regulatory act applicable to the EC type-approval. This number shall be followed by an alphabetical character reflecting the different vehicle categories in accordance with table 1 below. These alphabetical characters shall also distinguish the Euro 5 and 6 emission limit values to which the approval was granted.

Table 1

Character	Emissions standard	OBD standard	Vehicle category and class	Engine	Implementation date: new types	Implementation date: new vehicles	Last date of registration
A	Euro 5a	Euro 5	M, N ₁ class I.	PI, CI	1-9-2009	1-1-2011	31-12-2012
B	Euro 5a	Euro 5	M ₁ to fulfil specific social needs (excluding M ₁ G)	CI	1-9-2009	1-1-2012	31-12-2012
C	Euro 5a	Euro 5	M ₁ G to fulfil specific social needs	CI	1-9-2009	1-1-2012	31-8-2012
D	Euro 5a	Euro 5	N ₁ class II	PI, CI	1-9-2010	1-1-2012	31-12-2012
E	Euro 5a	Euro 5	N ₁ class III, N ₂	PI, CI	1-9-2010	1-1-2012	31-12-2012
F	Euro 5b	Euro 5	M, N ₁ class I.	PI, CI	1-9-2011	1-1-2013	31-12-2013
G	Euro 5b	Euro 5	M ₁ to fulfil specific social needs (excluding M ₁ G)	CI	1-9-2011	1-1-2013	31-12-2013
H	Euro 5b	Euro 5	N ₁ class II	PI, CI	1-9-2011	1-1-2013	31-12-2013
I	Euro 5b	Euro 5	N ₁ class III, N ₂	PI, CI	1-9-2011	1-1-2013	31-12-2013
J	Euro 5b	Euro 5+	M, N ₁ class I.	PI, CI	1-9-2011	1-1-2014	31-8-2015

K	Euro 5b	Euro 5+	M ₁ to fulfil specific social needs (excluding M ₁ G)	CI	1-9-2011	1-1-2014	31-8-2015
L	Euro 5b	Euro 5+	N ₁ class II	PI, CI	1-9-2011	1-1-2014	31-8-2016
M	Euro 5b	Euro 5+	N ₁ class III, N ₂	PI, CI	1-9-2011	1-1-2014	31-8-2016
N	Euro 6a	Euro 6-	M, N ₁ class I	CI			31-12-2012
O	Euro 6a	Euro 6-	N ₁ class II	CI			31-12-2012
P	Euro 6a	Euro 6-	N ₁ class III, N ₂	CI			31-12-2012
Q	Euro 6b	Euro 6-	M, N ₁ class I	CI			31-12-2013
R	Euro 6b	Euro 6-	N ₁ class II	CI			31-12-2013
S	Euro 6b	Euro 6-	N ₁ class III, N ₂	CI			31-12-2013
T	Euro 6b	Euro 6-plus IUPR	M, N ₁ class I	CI			31-8-2015
U	Euro 6b	Euro 6-plus IUPR	N ₁ class II	CI			31-8-2016
V	Euro 6b	Euro 6-plus IUPR	N ₁ class III, N ₂	CI			31-8-2016
W	Euro 6b	Euro 6	M, N ₁ class I	PI, CI	1-9-2014	1-9-2015	
X	Euro 6b	Euro 6	N ₁ class II	PI, CI	1-9-2015	1-9-2016	
Y	Euro 6b	Euro 6	N ₁ class III, N ₂	PI, CI	1-9-2015	1-9-2016	

Key:

'Euro 5a' emissions standard = excludes revised measurement procedure for particulates, particle number standard and flex

fuel vehicle low temperature emission testing with biofuel.

'Euro 6a' emissions standard = excludes revised measurement procedure for particulates, particle number standard and flex

fuel vehicle low temperature emission testing with biofuel.

'Euro 5+' OBD standards = includes relaxed in use performance ratio (IUPR), NO_x monitoring for petrol vehicles and

tightened PM threshold limits for diesel.

'Euro 6-' OBD standards = relaxed diesel OBD threshold limits, no in use performance ratio (IUPR).

'Euro 6- plus IUPR' OBD = includes relaxed diesel OBD threshold limits and relaxed in use performance ratio (IUPR)

Note: Article 4(7) only permits type-approvals according to characters W, X and Y to be performed once Euro 6 OBD thresholds have been introduced

2. *Examples of type–approval certification numbers.*
- 2.1 *An example is provided below of a first approval without any extensions of an Euro 5 light passenger vehicle. The approval was granted to the base regulation and its implementing regulation so the fourth component is 0001. The vehicle is of category M₁ represented by letter A. The approval was issued by the Netherlands:*
- e4*715/2007*[number of this Regulation]A*0001*00*
- 2.2 *This second example shows a fourth approval for the second extension of an Euro 5 light passenger vehicle of category M₁G meeting the special social needs requirements (letter C). The approval was granted to the base regulation and an amending regulation in the year 2009 and was issued by Germany:*
- e1*715/2007*.../2009C*0004*02*

TAAM Minutes:

Section 1.1

There were some concerns expressed about the robustness of the current system and some Member States reported that they are already conducting their own in-service audits.

However, there was a general consensus that the Type Approval Authorities would not be enthusiastic about the idea of performing the proposed statistical IUPR tests themselves instead of the manufacturers.

Section 1.2

The delegates were requested to send comments to the Commission concerning the format and content Table 1 of Appendix 6 of Annex 1 of Regulation 692/2008 so that these comments could be considered for inclusion in the next Comitology procedure amending Regulation 692/2008 by end of 2008 / beginning 2009.

6.7 2003/97/EC: Indirect Vision Information document entries, Germany 1

Question:

Is it necessary for the manufacturer to fill in points 9.9 – 9.9.2.1.2 of Annex III in his information document?

Issue:

Directive 2003/97 and the 02 series of amendments of R 46 mention new points for the information document of the WVTA . In older versions of the directive/reg. there were no information to this points (parts for indirect view)

If a manufacturer uses the directive 2003/97/EC approval or the R 46-02 approval for his WVTA shall he fill in the data?

Possible solutions:

Selection of solution		accepted	refused
A	If a manufacturer is still using the R46-01 series approval there is no entry of a.m. points in the Information doc concerning Annex III of 70/156/EEC		
B	If a manufacturer is using a R46-02 series or the directive 2003/97/EC approval he has to fill in the a.m. points in the Information doc concerning Annex III of 70/156/EEC		
C	The information of 9.9 – 9.9.2.1.2 have always to be filled in according to Annex III of 70/156/EEC		

TAAM Minutes:

The was a consensus view in support of Solutions A and B (although it was noted that the additional information is not complex and it should therefore be easy for the manufacturers to provide it).

74/483/EC EXTERIOR PROJECTIONS

DOOR HANDLE OPEN END

ISSUE

Directive 74/483/EC Section 6.6.2.2 comprises two parts.

Part 1 states that door handles which pivot outwards in any direction which is not parallel to the plane of the door shall, when in the closed position, be enclosed in a protective surround or be recessed. The open end shall face either rearwards or downwards.

Part 2 then states that handles which do not comply with this last condition (i.e. do not face either rearwards or downwards) may still be accepted if:

- they have an independent return mechanism,
- should the return mechanism fail, they cannot project more than 15 mm,
- they comply, in such opened position, with the provisions of paragraph 5.4., and
- their end surface area, when measured not more than 6.5 mm from the point projecting furthest, is not less than 150 mm²

DISCUSSION

There are some vehicles available with door handles as follows:



These opening face of these handles do not face either rearwards or downwards so it would seem that they must comply with both Part 1 and Part 2 of section 6.6.2.2.

However, their opening faces are blocked in so it perhaps could be argued that, in the examples shown, there is no 'open end' as such and hence, even when in the open position, there is no exposed open end (or gap). In this case it might be considered that the only relevant requirement would be that the 'door handles, when in the closed position, be enclosed in a protective surround or be recessed'.

Possibilities of solution

Comments

	A The door handles shown must comply with all the requirements of Section 6.6.2.2. (both Part 1 and Part 2)	
	B The door handles shown do not have 'open faces' and hence only need to meet the requirement be enclosed in a protective surround or be recessed (when in the closed position),	

TAAM Minutes:

The meeting agreed with Solution B

6.9 70/220/EEC and Commission regulation 692/2008/EC: Annex III Gears used for Type I test, Netherlands 6

Directive or Regulation number:	
- 70/220/EC and Commission Regulation 692/2008/EC	
Subject:	
Emissions from motor vehicles	
Reference to Annex, etc in the Directive or Regulation:	
- Annex III; Type I test point 2.3.1.	
Text:	
<p>Directive 70/220/EC</p> <p><i>“...The second, third and fourth gears may also be used for the urban cycle (Part One) and the second, third, four and fifth gears for the extra -urban cycle (Part Two) when the driving instructions recommend starting in second gear on level ground, or when first gear is therein defined as a gear reserved for cross- country driving, crawling or towing....”</i></p> <p>Commission Regulation 692/2008/EC</p> <p><i>The second, third and fourth gears may also be used for the urban cycle (Part One) and the second, third, fourth and fifth gears for the extra-urban cycle (Part Two) when the manufacturer's instructions recommend starting in second gear on level ground, or when first gear is therein defined as a gear reserved for cross-country driving, crawling or towing.</i></p>	
Question:	
To use only the 2 nd , 3 rd , 4 th and 5 th (optional also 6 th gear) during the type I test, how should these instructions be made known to the driver?	
Solutions:	
A	Owners manual
B	Website (official)
C	Permanent attached instruction near/on the gear lever

TAAM Minutes:

It was agreed that the manufacturer must make it very clear that 1st gear is only intended for special use conditions and the meeting considered both Solution A and Solution C to be required for this purpose.

6.10 70/220/EEC and Commission Regulation 692/2008/EC: Extensions to existing approvals, UK 4

70/220/EEC and COMMISSION REGULATION (EC) 692/2008 LIGHT VEHICLE EMISSIONS

EXTENSIONS TO EXISTING APPROVAL

BACKGROUND

Article 2 of Commission Regulation (EC) 692/2008 describes one of the criteria for definition of type as being the equivalent inertia required to cover the vehicle tests.

Section 3 in Annex 1 of EC Regulation 692/2008 describes provisions for extensions to approvals already granted. In particular, it states that a type-approval 'shall be extended only to vehicles with a reference mass requiring the use of the next two higher equivalent inertia or any lower equivalent inertia'.

Similar provisions exist in Directive 70/220/EEC (as amended by 2003/76/EC) in Annex 1, Sections 2 and 6 respectively.

DISCUSSION

Does this mean that an existing light vehicle emissions approval can be extended to cover up to 2 higher equivalent inertias without test?

Or

Does it simply mean that it can be extended to cover up to 2 higher equivalent inertias without creating a new type but that a new test would be required?

Note: There are other criteria for extension (e.g. change of gear ratio within 8%) that specifically do not require further testing (3.1.2.3 *If, for each transmission ratio, $E \leq 8\%$, the extension shall be granted without repeating the type 1 and type 6 tests).*

Possibilities of solution

Comments

<u>Possibilities of solution</u>	<u>Comments</u>
<p>A An existing approval may be extended to include derivatives with reference masses requiring up to two equivalent inertias higher within an existing type.</p> <p>However these new derivatives should still be tested at the appropriate higher inertia.</p>	
<p>B An existing approval may be extended to include derivatives with reference masses requiring up to two equivalent inertias higher within an existing type and without further testing</p>	

TAAM Minutes:

The meeting supported Solution B.

It was suggested that, when following this approach, Member States should ask manufacturers to verify compliance of all specifications covered by the approval via Conformity of Production processes.

Supplementary Notes:

Legislation

Commission Regulation (EC) 692/2008

Article 2 – Definitions

For the purposes of this Regulation, the following definitions shall apply:

1. 'vehicle type with regard to emissions and vehicle repair and maintenance information' means **a group of vehicles which do not differ in the following respects:**
 - (a) **the equivalent inertia determined in relation to the reference mass as provided for in paragraph 5.1 of Annex 4 of UN/ECE Regulation 83 (2);**
 - (b) **the engine and vehicle characteristics as set out in Appendix 3 of Annex I;**

Annex 1

3. **Extentions to Type-Approvals**

3.1. **EXTENSIONS FOR TAILPIPE EMISSIONS (TYPE 1, TYPE 2 AND TYPE 6 TESTS)**

3.1.1. *Vehicles with different reference masses*

3.1.1.1. **The type-approval shall be extended only to vehicles with a reference mass requiring the use of the next two higher equivalent inertia or any lower equivalent inertia.**

3.1.1.2. *For category N vehicles, the approval shall be extended only to vehicles with a lower reference mass, if the emissions of the vehicle already approved are within the limits prescribed for the vehicle for which extension of the approval is requested.*

3.1.2. *Vehicles with different overall transmission ratios*

3.1.2.1. *The type-approval shall be extended to vehicles with different transmission ratios only under certain conditions.*

3.1.2.2. *To determine whether type-approval can be extended, for each of the transmission ratios used in the type 1 and type 6 tests, the proportion,*

$$E = (V_2 - V_1) / V_1$$

shall be determined where, at an engine speed of 1 000 rpm, V_1 is the speed of the vehicle-type approved and V_2 is the speed of the vehicle type for which extension of the approval is requested.

3.1.2.3. *If, for each transmission ratio, $E \leq 8 \%$, the extension shall be granted without repeating the type 1 and type 6 tests.*

3.1.2.4. *If, for at least one transmission ratio, $E > 8 \%$, and if, for each gear ratio, $E \leq 13 \%$, the type 1 and type 6 tests shall be repeated. The tests may be performed in a laboratory chosen by the manufacturer subject to the approval of the technical service. The report of the tests shall be sent to the technical service responsible for the type-approval tests.*

3.1.3. *Vehicles with different reference masses and transmission ratios*

The type-approval shall be extended to vehicles with different reference masses and transmission ratios, provided that all the conditions prescribed in 3.1.1 and 3.1.2 are fulfilled.

Annex I

2. DEFINITIONS

For the purposes of this Directive:

2.1. "VEHICLE TYPE"

with regard to the tailpipe emissions from the engine, means a category of power-driven vehicles which do not differ in such essential respects as:

2.1.1. the equivalent inertia determined in relation to the reference mass as prescribed in section 5.1 of Annex III; and

2.1.2. the engine and vehicle characteristics as defined in Annex II.

6. MODIFICATIONS OF THE TYPE AND AMENDMENTS TO APPROVALS

In the case of modifications of the type approved pursuant to this Directive, the provisions of Article 5 of Directive 70/156/EEC and, if applicable, the following special provisions shall apply:[96/44-53]

6.1. TAILPIPE EMISSION RELATED EXTENSIONS

(type I, type II and type VI tests).[98/69-54]

6.1.1. Vehicle types of different reference masses.[93/59-55]

6.1.1.1. Approval granted to a vehicle type may be extended only to vehicle types of a reference mass requiring the use of the next two higher equivalent inertia or any lower equivalent inertia.[96/44-56]

6.1.1.2. In the case of vehicles of category N₁ and vehicles of category M referred to in note 2 of Section 5.3.1.4, if the reference mass of the vehicle type for which extension of the approval is requested requires the use of a flywheel of equivalent inertia lower than that used for the vehicle type already approved, extension of the approval is granted if the masses of the pollutants obtained from the vehicle already approved are within the limits prescribed for the vehicle for which extension of the approval is requested.[93/59-57]

6.1.2. Vehicle types with different overall gear ratios

Approval granted to a vehicle type may under the following conditions be extended to vehicle types which differ from the type approved only in respect of their transmission ratios:

6.1.2.1. For each of the transmission ratios used in the type I and type VI tests [98/69-58], it is necessary to determine the proportion, where, at an engine speed of 1 000 rpm, V₁ is the speed of the vehicle-type approved and V₂ is the speed of the vehicle type for which extension of the approval is requested.

6.1.2.2. If, for each gear ratio, $E \leq 8\%$, the extension is granted without repeating the type I and type VI tests.

6.1.2.3. If, for at least one gear ratio, $E > 8\%$ and if for each gear $E \leq 13\%$ the type I and type VI tests must be repeated, but may be performed in a laboratory chosen by the manufacturer subject to the approval of the technical service [96/44-59]. The report of the tests must be sent to the technical service responsible for the type-approval tests.

6.1.3. Vehicle types of different reference masses and different overall transmission ratios
Approval granted to a vehicle type may be extended to vehicle types differing from the approved type only in respect of their reference mass and their overall transmission ratios, provided that all the conditions prescribed in 6.1.1 and 6.1.2 are fulfilled.

6.1.4. Note:

When a vehicle type has been approved in accordance with 6.1.1 to 6.1.3, such approval may not be extended to other vehicle types.

6.11 2001/85/EC: Presentation in relation to TAAM email query, Poland 1

SUBJECT: Bus directive (2001/85/EC). Would such a vehicle configuration obtain a type-approval certificate in your country?

This question was asked to TAAM members in a query sent out on the 18th of August 2008 with a response from 13 countries. The detailed summary is on pages 3 and 4 of this Question. Since the overall result is inconclusive (7 - for, 6 - against), all TAAM members are kindly requested to prepare for a discussion in Edinburgh. This is addressed especially to the countries that have not replied to the query, i.e. Spain, Austria, Luxembourg, Finland, Estonia and Bulgaria.

With a kind permission of the Chairman, Poland would be pleased to deliver a short Power Point presentation prior to the discussion, as - in our opinion - the wording of both the Directive and the UN ECE Regulation concerning what is emergency door and what is emergency exit is not clear enough and confusing.

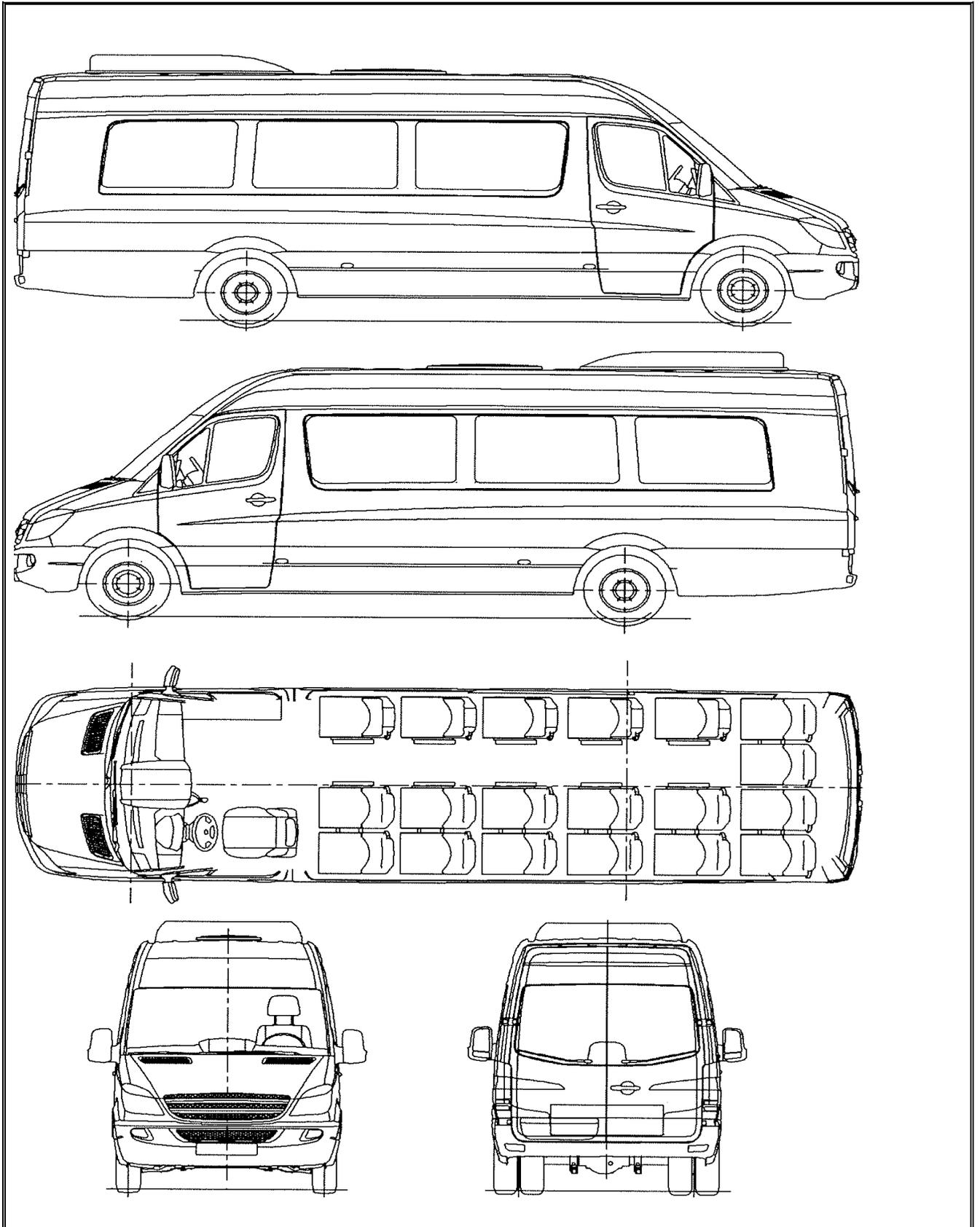
Background:

The paragraph 7.6.1.1. of the directive 2001/85/EC (and of the UN ECE Regulation No. 107.02) says: "The minimum number of doors in a vehicle shall be two, either two service doors or one service door and one emergency door..."

Question:

The drawing on the next page shows the vehicle in question. Would such a vehicle configuration obtain a type-approval certificate in your country in respect of the number of service and/or emergency doors?

	<u>Possible solution</u>	<u>Comments</u>
A	Yes	
B	No	



TAAM Minutes:

There were strong views both for and against the acceptability of this arrangement and hence the view of the meeting was that this question should be referred to GRSG. Poland agreed to submit a proposal to GRSG accordingly.

6.12 76/114/EEC: Statutory Plates, Slovenia 1

- Regulation number:

Directive 76/114/EEC amended 78/507/EEC relating to statutory plates and inscriptions for motor vehicles and their trailers and their location and method of attachment

- Issue

If you get on individual approval the vehicle without statutory plate or with incorrect statutory plate, do you accept such vehicle?

Possibilities of solution

Comments

	<u>Possibilities of solution</u>	<u>Comments</u>
	A Only check documentation and accept such vehicle.	
	B Customer has to order the new statutory plate.	

TAAM Minutes:

The general view of the meeting was in support of Solution B.

6.13 76/114/EEC: VIN, Slovenia 2

- Regulation number :

Directive 76/114/EEC amended 78/507/EEC relating to statutory plates and inscriptions for motor vehicles and their trailers and their location and method of attachment

- Issue

If you get on individual approval the vehicle without VIN number of the vehicle. Do you have your own system to declare VIN numbers (for unique vehicles)?

Possibilities of solution

Comments

	<u>Possibilities of solution</u>	<u>Comments</u>
A	Only check documentation and accept such vehicle.	
B	Declare new VIN number.	

TAAM Minutes:

The general view of the meeting was in support of Solution B

It was noted that, in most Member States, the registration authority would supply the VIN in situations like this.

6.14 2001/85/EC: Bus and Coach Directive Additional national requirements, Germany 6

Issue

Buses are currently not completely covered by the EC type approval scheme. On 13. February 2002 Directive 2001/85/EC relating to special provisions for vehicles used for the carriage of passengers comprising more than eight seats in addition to the driver's seat entered into force. All Member States were obliged to adopt the requirements of this Directive either in addition to, or in place of, their existing rules (recital No. 5 of 2001/85/EC).

It has been reported that some Member States require additional technical modifications in order to permit the carriage of passengers in public transport especially concerning the accessibility of people with reduced mobility. The following questions were raised:

- Does the application of additional national requirements with regard to the carriage of passengers in public transport comply with the current EC legislation?
- Will the application of additional national requirements with regard to the carriage of passengers in public transport comply with Directive 2007/46/EC (as from 29. April 2009)?

Prescription

Directive 2007/46/EC

Possibilities of solution

Comments

A	The application of additional national requirements is currently permitted for busses with regard to the carriage of passengers in public transport.	
B	The application of additional national requirements for busses with regard to the carriage of passengers in public transport will comply with the provision set out in Directive 2007/46/EC.	

TAAM Minutes:

The meeting agreed that, in principle, a vehicle with EC Type Approval is suitable for registration in any Member State and, as such, should also be accepted for use for the general purpose for which it was approved without the need for the vehicle to comply with additional requirements.

However, it was accepted that there could be certain in-use requirements for specific usage patterns and requirements for operational equipment (e.g. fire extinguishers and first-aid kits) which could be additional to those covered by the original EC Type Approval but, when appropriate, these must be notified to the Commission to ensure compatibility with EC principles under the provisions of 98/34/EC.

6.15 94/20/EC: Coupling Devices, Sweden 1

SUBJECT: Coupling Devices
DIRECTIVE: 94/20/EC

RELEVANT SECTION:

DIRECTIVE 94/20/EC

1. Scope

1.1. This Directive applies to the mechanical coupling devices for motor vehicles and their trailers and the attachment of these devices to the road vehicles, as described in Article 1 of this Directive.

1.2. This Directive states the requirements which mechanical coupling devices intended for use between combinations of vehicles must satisfy in order to:

- ensure compatibility when combining motor vehicles with different types of trailer,
- ensure the safe coupling together of the vehicles under all conditions of use,
- ensure safe procedures for coupling and uncoupling

2.1.18. The 'D-value' is defined as the theoretical reference force for the horizontal force between towing vehicle and trailer.

2.1.19. The 'V-value' is defined as the theoretical reference force for the amplitude of the vertical force between towing vehicle and centre axle trailers having a maximum mass exceeding 3,5 tonnes (see Section 2.1.21).

2.3.2. *Need for remote controlled couplings*

10.3.1. If a remote control device is employed, there must also be a remote indication device as described in Section 10.2 which must also indicate the open condition of the coupling
 (Text.....)

QUESTION / PROBLEM / CONCERN:

1. Is the directive applicable for coupling devices between two trailers?

A	Yes	
B	No	
C	No vehicle trains with two trailers are allowed	

2. When defining D and V values at a coupling point, should mass of the third vehicle be taken to account?

Adding the mass of the third vehicle to the mass of the nearest vehicle may result to very high values and thus to oversized coupling devices, which however is not a safety problem. Relatively, only leaving it out may result to under dimensioned couplings, possibly causing a problem. A proposal to a ISO standard suggests, that mass of the third vehicle is partially taken to account; the factor is defined by location of the coupling point in relation to mass centre of the vehicle. Directive doesn't clearly state this possibility.

A	Yes	
B	No	
C	Other	

3. If mounting of coupling device creates a need for remote controlled coupling device and remote indication device as on trucks, is this applicable to trailers? From safety aspects it shouldn't matter whether the coupling device is mounted on truck or trailer, but there are no standards/requirements on how control should be carried over between truck and trailer, thus leading to vehicle-individual solutions.

A	Yes	
B	No	

Selection of solution		accepted	refused
1. yes	A		
1. no	B		
1. not allowed	C		
2. yes	A		
2. no	B		
2. other	C		
3. yes	A		
3. no	B		

TAAM Minutes:

Some delegates were concerned that simple addition of the relevant masses would not be sufficient.

The advice of the meeting was that due to the lack of experience of operating double linked trailers it would be better not to grant approval for this coupling.

6.16 70/156/EEC Annex II: Definition of bodywork, Romania 4

Directive 2007/37/CE amending 70/156/CEE; directive 2007/46/CE Annex II

Subject: point C „definition of type of bodywork”

Fact: the definition is based on a very old ISO (issued in 1977) and now is really obsolete making a lot of confusion and being very open to personal approach.

We want to clarify this problem and perhaps it will be in our benefit to propose a revision of the above point by a future amendment of the frame-work directive.

For this revision we think it will be necessary to create a small sub-group in the next TAAM or, to be more efficient, to come directly with some proposal at the next TAAM .

We want to know the opinion of the TAAM delegates and of the representative of European Commission if the problem is to be considered important enough to be taken in discussion

TAAM Minutes:

The meeting considered that, whilst the current bodywork definitions are out of date, they are not critical to the current EC Type Approval process and the issue was not considered appropriate for further discussion in the TAAM.

The Commission noted that a review of bodywork definitions is currently ongoing within a UN ECE working group and the EC would expect to adopt the recommendations once the review is complete.

7. ITEMS RELATING TO FRAMEWORK DIRECTIVE 92/61/EEC AND 2002/24/EC (MOTORCYCLES)

7.1 2002/24/EC: Certificate of Conformity (coloured graphics), Austria 1

Directive 2002/24/EC, COC, Coloured Graphics

Article 7 (1), second subparagraph reads of Directive 2002/24/EC reads:

“The certificate of conformity shall be made in such a way as to prevent any forgery. For this purpose, the printing shall be made on paper protected either by coloured graphics or watermarked with the vehicle manufacturer's identification mark.”

The COC's of a manufacturer bears as only two coloured items: the stamp of RDW and a stamp of a dealer (see attached facsimile)

TAIZHOU TRAIL-BLAZER MANUFACTURING CO., LTD.

EC CERTIFICATE OF CONFORMITY

The undersigned,
TAIZHOU TRAIL-BLAZER MANUFACTURING CO., LTD.
hereby certifies that the following vehicle:

0.1. Make:	TBM
0.2. Type:	TBM250
Variant:	Not Applicable
Version:	Not Applicable
0.2.1 Commercial name(s) (where appropriate):	TBM250
0.4 Vehicle category:	L7e(Quadricycles)
0.4.1 Vehicle category according to Directive 97/24/EC, Chapter 7	Not applicable
0.5. Name and address of the manufacturer:	TAIZHOU TRAIL-BLAZER MANUFACTURING CO., LTD., Chengnan, Wenling City, Zhejiang Province, 317500
0.6. Location of the statutory plate:	R, x1370,y430,z780
Vehicle identification number:	LOBBTRGY380000137
0.7. Location of the vehicle identification number on the chassis:	R, x1110,y360,z720

Conforms in all respects to the type described in EC type-approval

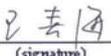
- EC type-approval number: e4*2002/24*1696*00

- Dated:

The vehicle can be permanently registered without requiring any further approvals, for driving on the right and left and for using metric/imperial units for the speedometer.

Zhejiang, China
(place)

April 30, 2008
(date)


(signature)

General Manager
(Position)



Question:

Does this COC fulfil the prescriptions of Directive 2002/24/EC?

Possibilities of solution

Comments

A	These Certificates of Conformity are not valid, registration is not possible. No additional measures are required.	
B	These Certificates of Conformity are not valid, registration is not possible. The type approval authority that issued the type approval form should be informed.	
C	These Certificates of Conformity are valid, registration is possible. The stamp of the TAA is allowed to be the only one coloured graphic on the COC.	

TAAM Minutes:

The meeting confirmed that the CoC must be printed on the manufacturer's own paper with the manufacturer's own coloured graphics or watermark.

If a Member State is not sure about the validity of a CoC it should reject the CoC and refer back to the Approving Authority.

The meeting therefore agreed with Solution B.

7.2 97/27/EC Chapters 11 & 12: bodied vehicles, Ireland 1

SUBJECT: Chapters 11 (safety belts) and 12 (glazing, windscreen wipers) of 97/24/EC

Background:

EC Directive 2006/27/EC amended EC Directive 97/24/EC chapter 12 as follows:

“For the purpose of this Chapter “bodied vehicle” means a vehicle for which the passenger compartment is bounded or may be bounded by at least four of the following elements: windscreen, floor, roof, side and rear walls or doors.”

Chapters 11 and 12 of EC Directive 97/24/EC require bodied quadricycles to be fitted with safety belts, glazing, windscreen wipers, washers etc.

Question:

In the photograph below, is this vehicle bodied and therefore requires approval to Chapters 11 and 12 of EC Directive 97/24/EC?



	<u>Possible solution</u>	<u>Comments</u>
A	Yes it is bodied and does require approval to chapters 11 and 12 of 97/24/EC	
B	No it is not bodied and therefore does not require approval to chapters 11 and 12 of 97/24/EC	

TAAM Minutes:

Whilst difficult to judge, there was a general view that this vehicle should be considered to be bodied.

However, it was noted that, as a result of the 2006/27/EC amendments, the requirement for seat belts is now applicable to all three-wheeled mopeds, tricycles, light quadricycles and quadricycles fitted with seats according to the provisions of Chapter 11 Annex I Section 2.1. This applies irrespective of whether or not the vehicle is fitted with a body.

The distinction in respect of requirements for seat belt anchorage/seat belt fitment is therefore between vehicles fitted with seats and those fitted with saddles.

It was noted that there is no mandatory requirement for these vehicles to actually be fitted with a windscreen and hence, as this vehicle does not have a windscreen, wipe/wash and de-ice/de-mist equipment would not be needed.

Supplementary Notes:

97/24 CHAPTER 11 AS AMENDED BY 2006/27

CHAPTER 11 - SAFETY-BELT ANCHORAGES AND SAFETY-BELTS OF THREE-WHEEL MOPEDS, TRICYCLES AND QUADRICYCLES

ANNEX I

1. DEFINITIONS

1.6. "seat" means a structure, whether or not forming an integral part of the vehicle structure and including its trim, which offers a seated position for an adult, the term designating both an individual seat and part of a bench corresponding to a seating position. **A saddle is not considered to be a seat for item 2.1.**

1.6a. "saddle" means a seating position where the rider or passenger sits astride.

2. GENERAL REQUIREMENTS

2.1. Whenever safety belt anchorages are fitted, these must comply with the prescriptions in this Chapter.

2.1.1. Safety belt anchorages must be fitted for all **seats** of three-wheeled mopeds, tricycles, light quadricycles and quadricycles.

2.1.1.1. Anchorage points suitable for three-point belts are required for all seats that meet both of the following conditions:

- when the seat has a back or when a support helps to determine the back rest angle of the dummy and may be considered as a seatback, and
- when there is a lateral or transversal structural element behind the H point at a height of more than 450 mm measured from the vertical plane of the H point.

2.1.1.2. For all other seats, anchorages suitable for lap belts are acceptable.

2.1.2. Safety belt anchorages are not mandatory for three-wheeled mopeds or quadricycles having an unladen mass of not more than 250 kg.

7.3 2002/24/EC: Unladen mass in respect of vehicles intended for carrying goods, Austria
2

Directive 2002/24/EC, unladen mass, vehicles intended for carrying goods

Article 1 (3), lit. b of Directive 2002/24/EC reads :

“(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.”

This quadricycle has masses as follows:

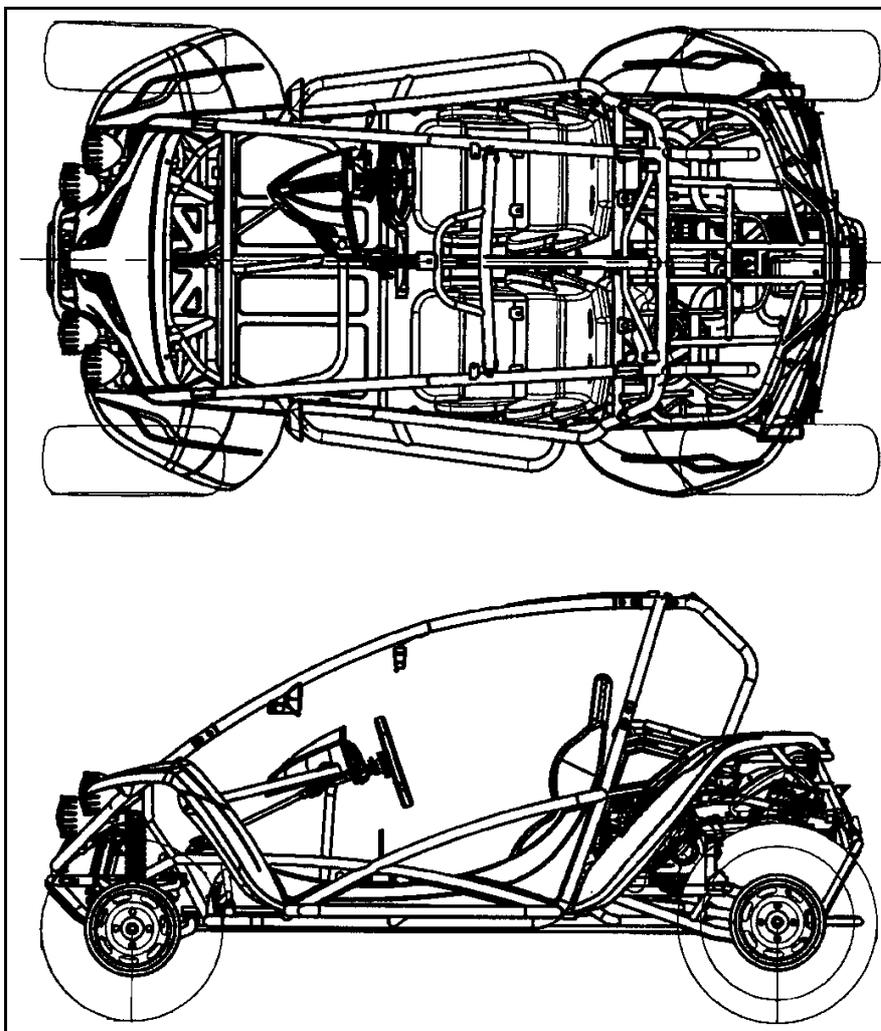
Unladen mass: 470 kg

Mass in running order: 485 kg

Mass in running order, together with rider: 560 kg

Maximum technically permissible mass: 655 kg

The payload without passenger is 95 kg, with passenger (68 kg): 25 kg



Question:

Is this quadricycle intended for carrying goods?

Possibilities of solution

Comments

A	This quadricycle is intended for carrying goods and is in the scope of Directive 2002/24/EC (Category L7e).	
B	It is not possible to carry goods with such a vehicle (no compartment for goods or platform, not enough payload). This quadricycle is out of the scope of Directive 2002/24/EC.	

TAAM Minutes:

The meeting agreed that the vehicle shown is not a quadricycle intended for carrying goods (i.e. Solution B).

The concern is that manufacturers can declare quadricycles to be good vehicles in order to benefit from increased unladen mass allowance (550 kg for a goods vehicle compared with 400 kg for a passenger vehicle).

There was some support for a suggestion that the formula used for AF M1 vehicles in 70/156/EEC Annex 2 Section C (goods vehicle if goods payload mass is greater than total passenger mass) could be used. However, as there is no legislative justification for this within 2002/24/EC, it could only be used to provide a general guide.

There was also some concern expressed that, because there is no maximum GVM limit for quadricycles, the manufacturers could still try to get the goods vehicle classification by artificially inflating the GVM to increase the payload used for the calculation method.

The meeting therefore accepted that this would have to be a case by case judgement which could be based on the dimensions and position of the load space in conjunction with a payload mass versus passenger load comparison.

Supplementary Notes:

LEGISLATION

2002/24/EC

CHAPTER I - Scope and definitions

Article 1

3. This Directive shall also apply to quadricycles, i.e. motor vehicles with four wheels having the following characteristics:

- (a) light quadricycles whose unladen mass is not more than 350 kg (category L6e), 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 cm³ 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.

+++++

70/156/EEC (as amended)

ANNEX II – DEFINITION OF VEHICLE CATEGORIES AND VEHICLE TYPES

C. DEFINITION OF TYPE OF BODYWORK (only for complete/completed vehicles)

- | | |
|---------------------------------|--|
| AF Multi-purpose vehicle | <p>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:</p> <ul style="list-style-type: none">(a) the number of seating positions, excluding the driver, is not more than six.
a “seating position” shall be regarded as existing if the vehicle is provided with “accessible” seat anchorages. “accessible” shall mean those anchorages, which can be used. In order to prevent anchorages being “accessible”, the manufacturer shall physically obstruct their use, for example by welding over cover plates or by fitting similar permanent fixtures which cannot be removed by use of normally available tools; and(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.

8. ITEMS RELATING TO FRAMEWORK DIRECTIVE 74/150/EEC AND 2003/37/EC (AGRICULTURAL AND FORESTRY TRACTORS)

8.1 2003/37/EC: Recognition of OECD reports for agricultural tractors, European Commission 3

Questions relating to Directive 2003/37/EC regarding the recognition of OECD reports for agricultural tractors

Question 1: Meaning of 'complete bulletins' as referred to in Annex II, Chapter B, Part II.C of Directive 2003/37/EC

The Directive reads:

"Correspondence with the OECD standardised codes: The test bulletins (complete) which conform to the OECD codes given below may be used in place of the test reports drawn up in compliance with the corresponding separate directives."

The Commission services are of the opinion that the term 'complete OECD bulletins' (in future: report) means a report drawn up by an OECD accepted test house, duly signed and approved by the OECD Coordination Centre (CEMAGREF), which assigns as well the approval number.

Background: The OECD - Coordination Centre needs a certain time to check the reports. As a consequence industry has to wait sometimes several months for the approval number. Because of this some concerned parties discussed the possibility to shorten the procedure by using the requirements but not issuing a formal OECD report.

The Commission deems it important to use either the complete EC procedure (truck requirements) or the OECD system and not a mixed system. In particular checking the OECD report by the Coordination Centre and the resulting approval number is deemed important.

Question: Do you agree that OECD reports, in order to be accepted as equivalent to EU approvals, shall be approved by the OECD Coordination Centre and show an approval number?

Possibilities of solutions

A	Yes, OECD reports, in order to be accepted as equivalent to EU approvals, shall be approved by the OECD Coordination Centre and show an approval number	
B	No, OECD reports, in order to be accepted as equivalent to EU approvals, need not be approved by the OECD Coordination Centre and an approval number is not necessary	

Question 2: Requirements for anchorage points

OECD reports (in the past called ‘bulletins’) are important for industry as they are accepted worldwide. But the OECD requirements for anchorage points are lower than in the EC. The Directive on anchorages (76/115/EEC for motor vehicles) is designed for frontal crashes, whereas the requirements in the OECD Codes are basically meant to retain the driver in his seat when the tractor rolls over. This should be considered as adequate for the purpose of tractor approval.

The OECD system provides that participating countries shall appoint a National Designated Authority. The participating country or the NDA may appoint one or more testing stations (on or outside its territory). Some countries want to use EU- test houses to issue a Directive approval while only applying the less severe OECD-requirements.

Question: Do you agree that an EC approval can only be based on the Directive, while the OECD report shall at least cover the ROPS test and may, in addition, include results of the test of anchorage points for safety belts (optional in the Code)?

Possibilities of solutions

A	Yes, the report shall at least cover the ROPS test and may include results of the test of anchorage points for safety belts (optional in the Codes)	
B	No, the report could cover only the test of anchorage points for safety belts	

TAAM Minutes:

The meeting agreed as follows:

Question 1: Solution A

Question 2: Solution A

8.2 2005/13/EC ANNEX IV: Flexibility Scheme, Romania 1

Directive 2005/13/CE amending 2000/25/CE and 2003/37/CE

Subject: Annex IV Flexibility scheme

Fact: We received some letters concerning the application of flexibility scheme for various manufacturers (Manitou, Kubota, Yanmar, Schwing, Volvo Construction, Holmer etc). We are a little confused because there is no uniform way of approaching the subject. We received by these letters the following information or complementary documents:

- the maximum permitted number of the engines to be placed on the European market;
- the serial number of the engines and the period of sale;
- the countries where the engines will be sold;
- a sample of the labels affixed to the tractor in which the engine will be installed (see Annex IV point 1.4);
- a letter from the authority which approved the engine from the point of view of the directive we talk about.

All the letters are a mixture of the above information starting with some which give us **only** the maximum permitted number and ending by some which offer much more information but **none** of them have all the information (for instance, only one has a sample of the label). We haven't received till now, all this after, any letter as the point 1.6 Annex IV prescribes.

Taking account of the large "palette" of approaching we propose the following content of the letter as solution A:

1.	The total number of engines;
2.	The serial number of each engine or the quantity which will be placed on a specific market (the destination for every quota);
3.	The sample of the label (and the location of affixing);
4.	The acceptance address from the type approval authority in charge with the initial type approval (which may include point 1).

If the selected solution is not as above please formulate a proposal

TAAM Minutes:

It was noted that there is a difference between the information required to be supplied to the issuing authority and the information required to be supplied to the receiving authority (see Annex IV Sections 1.4 and 1.6 respectively).

The information required to be supplied to the receiving authority does not include a sample of the label.

It was suggested that if Romania wished to change this situation they should submit a proposal to the appropriate EC Working Group.

Supplementary Notes:

LEGISLATION

ANNEX IV - PROVISIONS FOR TRACTORS AND ENGINES PLACED ON THE MARKET UNDER THE FLEXIBILITY SCHEME LAID DOWN IN ARTICLE 3A

1. ACTIONS BY THE ENGINE AND THE TRACTOR MANUFACTURERS

- 1.1. A tractor manufacturer, who wishes to make use of the flexibility scheme, shall request permission from his approval authority to place or to source from his engine suppliers, in the period between two emissions stages, the quantities of engines described in section 1.2 and 1.3 that do not comply with the current emission limit values, but are approved to the nearest previous stage of emission limits.
- 1.2. The number of engines placed on the market under a flexibility scheme shall, in each engine category, not exceed 20 % of the tractor manufacturer's annual sales of tractors with engines in that engine category (calculated as the average of the latest 5 years sales on the EU market). In the case that a tractor manufacturer has marketed tractors in the EU for a period of less than five years the average will be calculated based on the period for which the tractor manufacturer has marketed tractors in the EU.
- 1.3. As an alternative option to section 1.2, the tractor manufacturer may seek permission for his engine suppliers to place on the market a fixed number of engines under the flexibility scheme. The number of engines in each engine category shall not exceed the following values:

Engine Category	Number of Engines
19-37 kW	200
37-75 kW	150
75-130 kW	100
130-560 kW	50

- 1.4. The tractor manufacturer shall include in his **application to an approval authority** the following information:
- (a) **a sample of the labels to be affixed to each tractor in which an engine placed on the market under the flexibility scheme will be installed.** The labels shall bear the following text: "TRACTOR NO ... (sequence of tractors) OF ... (total number of tractors in respective power band) WITH ENGINE NO. ... WITH TYPE APPROVAL (Directive 2000/25/EC) NO ..."; and
- (b) **a sample of the supplementary label to be affixed on the engine** bearing the text referred to in section 2.2 of this Annex.
- 1.5. The tractor manufacturer shall provide the approval authority with any information connected with the implementation of the flexibility scheme that the approval authority may request necessary to make a decision.
- 1.6. The tractor manufacturer shall file a report every six months to the **approval authorities of each Member State, where the tractor or engine is put on the market,** on the implementation of the flexibility schemes he is using.
The report shall include cumulative data on the number of engines and tractors placed on the market under the flexibility scheme, engine and tractor serial numbers, and the Member States where the tractor has been entered into service.
This procedure shall be continued as long as a flexibility scheme is still in progress.

2. ACTIONS BY THE ENGINE MANUFACTURER

- 2.1. An engine manufacturer may supply engines to a tractor manufacturer under a flexibility scheme covered by an approval in accordance with section 1 of this annex.
- 2.2. The engine manufacturer must put a label on those engines with the following text: "Engine placed on the market under the flexibility scheme".

3. ACTIONS BY THE APPROVAL AUTHORITY

The approval authority shall evaluate the content of the flexibility scheme request and the enclosed documents. As a consequence it will inform the tractor manufacturer of its decision as to whether or not to allow use of the flexibility scheme.

Directive 2000/25/EC and Directive 2003/37/EC

Background:

Directive 2000/25/EC, Article 4 "Timetable" (para. 3 and para.6 for the initial entry into service of engines and tractors)

Directive 2003/37/EC, Article 10 "End-of- series vehicles"

According to the provisions of Directive 2000/25/EC (Article 4, para. 6) "For engines of categories H to R, the dates laid down in paragraph 3 (for initial entry into service of engines and tractors) shall be postponed for two years with respect to engines with a production date prior to the said date."

In compliance with Directive 2003/37/EC, Article 10 "End-of-series vehicles", Member States may, at the request of the manufacturer, register and permit the sale or entry into service of new vehicles that conform to a type of vehicle the approval of which is no longer valid, **within the quantitative limits set out in Annex V, Section B**, (for the limited period of 24 months for complete vehicles and 30 months for completed vehicles from the date of expiry of the EC type-approval).

Provisions of legislation:

Directive 2000/25/EC, Article 4

Timetable

3. Member States shall prohibit the initial entry into service of engines and tractors where the pollutants emitted by the engines do not meet the requirements of the Directive:

- after 30 June 2001 for engines of categories A, B, and C,*
- after 31 December 2001 for engines of categories D and E,*
- after 31 December 2002 for engines of category F,*
- after 31 December 2003 for engines of category G,*
- after 31 December 2005 for engines of category H,*
- after 31 December 2006 for engines of categories I,*
- after 31 December 2006 for engines of categories K,*
- after 31 December 2007 for engines of category J,*
- after 31 December 2010 for engines of category L,*
- after 31 December 2011 for engines of categories M*
- after 31 December 2011 for engines of categories N,*
- after 31 December 2012 for engines of category P,*
- after 31 December 2013 for engines of category Q,*
- after 30 September 2014 for engines of category R.*

.....

6. For engines of categories H to R, the dates laid down in paragraph 3 shall be postponed for two years with respect to engines with a production date prior to the said date."

Directive 2003/37/EC (Article 10 and Annex V)

End-of-series vehicles

For end-of-series vehicles, Member States may, at the request of the manufacturer, within the quantitative limits set out in Annex V, Section B, and for the limited period specified in the third subparagraph, register and permit the sale or entry into service of new vehicles that conform to a type of vehicle the approval of which is no longer valid.

.....

This option shall be restricted to a period of 24 months for complete vehicles and 30 months for completed vehicles from the date of expiry of the EC type-approval."

Question:

For the tractor type fitted with engine benefiting from the two-year period according to Art. 4 of Directive 2000/25/EO is it possible the manufacturer to use 24 months (for complete vehicles) or 30 months (for completed vehicles) under the End-of-Series scheme (according to Art. 10 of Directive 2003/37/EO), after the two-year period?

Possibilities of solution

Comments

A	It is possible	
B	It is not possible	

TAAM Minutes:

The meeting supported Solution A

8.4 2003/37/EC 'certain categories of vehicles', Bulgaria 3

Directive 2003/37/EC

Issue:

Article 1

Scope

2. This Directive does not apply to:

(a) approval of single vehicles;

However, this procedure may apply to certain categories of vehicles which fall within the scope of this Directive and for which EC type - approval is obligatory.

Question:

We would like to ask the other Member States to share their views on the possibility to interpret "certain categories of vehicles" as "all categories for which EC type-approval is obligatory - T1, T2 and T3".

Possibilities of solution:

In our opinion the above-mentioned provision must be interpreted as possibility of the respective MS to decide exact categories among T1, T2 and T3.

A	Support above - given solution	
B	Other comment (please specify)	

TAAM Minutes:

The meeting agreed that, as an alternative to full EC type Approval, single vehicle approval can be granted to vehicles of the categories covered by 2003/37.

9. MISCELLANEOUS

9.1 Short report of the ETAES-Meeting

TAAM Minutes:

The Chair of ETAES gave a report of the ETAES meeting held on 8 October 2008. The key points are as follows:

ETAES II

ETAES II is now fully in operation. Java 1.5 is required for optimum performance. (The system will operate with Java 1.6 but the performance will not be optimised. The system will not work with Java 1.4).

All participants will be required to pay an equal share of the ETAES running costs. The annual cost per country is currently estimated to be 2000 Euros.

Financing for ETAES will be obtained by means of a direct invoice approach and Germany will send details of the 'Service Level Agreement' to all participants.

The first payment period will from 1 January 2009 until 31 December 2009 inclusive. Invoices will be sent out in October 2009 and then at the same time each year thereafter.

Monitoring of the operation of ETAES and of the Service Level Agreement will be through the ETAES Management Group (i.e. the regular ETAES group that was formed as a sub-group of the TAAM). The ETAES Management Group will therefore have the main input into the running of ETAES but, whenever appropriate, there will be subsequent consultation with all participants.

Each participating Member State must now send KBA the details of a contact person for invoicing together with details of any individual needs regarding timing and procedure for invoicing. Any comments related to this Service Level Agreement should be sent to KBA as soon as possible.

DETA

Discussions concerning electronic exchange of ECE regulations are still ongoing.

XML

The XML Sub-Group work is progressing but there is a need for more countries and more manufacturers to become involved.

Other ETAES opportunities

There are also ongoing discussions to explore opportunities for using ETAES for:

- Exchange of National Small Series approval information,
- Exchange of approval data for parts and components (e.g. catalysts, replacement silencers, brake linings etc.)
- Possible exchange of information associated with the notification of recalls to Approval Authorities in relation to Article 32 of 2007/46/EC.

9.2 ECE R51 Monitoring procedure, European Commission 2

Brief overview and exchange of views concerning the information received by the Commission regarding the monitoring procedure as required by UN/ECE Regulation 51 (from 1 July 2007) and Directive 70/157/EEC as amended by Directive 2007/43/EC (from 6 July 2008).

TAAM Minutes:

The Commission reported that, whilst they had now received test result data from several Member States, there were still some authorities that had not yet submitted any information.

The Commission reminded all authorities of their obligation to provide noise test data under the provisions of UN/ECE Regulation 51 (from 1 July 2007) and Directive 70/157/EEC as amended by Directive 2007/43/EC (from 6 July 2008). Those authorities not yet complying with this requirement were requested to submit data as soon as possible.

9.3 ECE R21 Annex VIII: Determination of head impact zone, Spain 4

Issue: Determination of a dynamically determined head impact zone

Legislation: Annex VIII, 21R01

“3. If the vehicle type can be fitted with different protective systems it is sufficient to investigate the protective system with the minimum performance. However, protective systems that can be deactivated by the driver or the occupant have to be set as recommended and indicated by the manufacturer in the owners handbook.”

If the manufacturer provide for permanent deactivation of a part of the protective system, then this part has to be set to the deactivated configuration.”

Question:

We find that there is an inconsistency between these two paragraphs written above. On one hand it seems that the recommendations from the manufacturer must be followed but on the other this seems to be in contradiction with second sentence.

Consequently, if the vehicle type has a switch to activate/deactivate the airbag system, should that test be performed with the airbag connected or disconnected?

Possibilities of solution

Comments

A	Connected	Makes sense to use the manufacturer’s recommendation regarding to the protective system especially considering the tell-tail in case of deactivation of the airbag and the settings of the seat belts.
B	Disconnected	This is the worst case but it normally does not follow manufacturer’s recommendation.

TAAM Minutes:

The meeting agreed with Solution A subject to the following:

- **There must be a clear warning visible to the vehicle occupants whenever all or part of the protective system is in the de-activated configuration.**

Note: This minute reflects the outcome of further discussion concerning this issue at the subsequent TAAM held in Bern, Switzerland on 26-27 March 2009 (TAAM Bern Agenda Item 4.4).

9.4 ECE R90: Packaging and marking requirements, UK 5

ECE REGULATION 90 REPLACEMENT BRAKE LININGS

PACKAGING AND MARKING REQUIREMENTS

BACKGROUND

Section 6 of ECE Regulation 90 states requirements for the marking of packaging as follows:

- 6.3. Each package shall display the following information:
 - 6.3.1. the quantity of replacement brake lining assemblies or replacement drum brake linings in the package;
 - 6.3.2. manufacturer's name or trade mark;
 - 6.3.3. make and type of replacement brake lining assemblies or replacement drum brake linings;
 - 6.3.4. the vehicles/axle/brakes for which the contents are approved;
 - 6.3.5. the approval mark.

ISSUE

A brake pad manufacturer packages replacement motorcycle brake pads on an A5 sized piece of cardboard which is then blister packed.

The manufacturer produces some brake pads that will fit many combinations of vehicles (sometimes more than a hundred) and it is not always practical to print all the required information on the cardboard packaging in a font size that is legible (font too small).

Possibilities of solution

Comments

	<u>Possibilities of solution</u>	<u>Comments</u>
A	The manufacturer must display all the applications in a legible font on the external packaging.	This meets the requirements of the Regulation but the size of the packages required could be inconvenient for the manufacturer.
B	The most popular models are put on the packaging with clear instructions displayed explaining that a full list of applications is available inside the packaging with the fitting instructions.	If a purchaser has opened the package to confirm that their machine is on the list and has then found that they have purchased the incorrect part then the product could not be resold when returned to the point of sale (prior opening)

TAAM Minutes:

The meeting recognised the problem but the key issue was balancing the need for the necessary fitment information to be available against the need for the packaging to not be tampered with.

The meeting discussed a range of opportunities but some of the most practical solutions would not be within the letter of the legislation.

The UK will consider the need for a proposed amendment to the legislation.

Supplementary Notes:

LEGISLATION

ECE Regulation No. 90

UNIFORM PROVISIONS CONCERNING THE APPROVAL OF REPLACEMENT BRAKE LINING ASSEMBLIES AND DRUM BRAKE LININGS FOR POWER-DRIVEN VEHICLES AND THEIR TRAILER

6. PACKAGING AND MARKING

- 6.1. Replacement brake lining assemblies or replacement drum brake linings conforming to a type approved in accordance with this Regulation shall be marked in axle sets.
- 6.2. Each axle set shall be **contained in a sealed package constructed to show previous opening.**
- 6.3. Each package shall display the following information:
 - 6.3.1. the quantity of replacement brake lining assemblies or replacement drum brake linings in the package;
 - 6.3.2. manufacturer's name or trade mark;
 - 6.3.3. make and type of replacement brake lining assemblies or replacement drum brake linings;
 - 6.3.4. the vehicles/axle/brakes for which the contents are approved;
 - 6.3.5. the approval mark.
- 6.4. Each package shall contain fitting instructions in an official ECE language, supplemented by the corresponding text in the language of the country where it is sold:
 - 6.4.1. with particular reference to auxiliary parts;
 - 6.4.2. stating that replacement brake lining assemblies or replacement drum brake linings should be replaced in axle sets;
 - 6.4.3. with, in the case of replacement drum brake linings, a general statement calling attention to the following points:
 - the integrity of the shoe platform, abutment and pivot;
 - freedom of the shoe from distortion, deformation and corrosion;
 - the type and size of rivet to be used;
 - the required riveting tools and forces.
 - 6.4.4. with, additionally, in the case of combined braking systems in the meaning of paragraph 2.9. of Regulation No. 78 giving the approved brake lining assembly combination(s).
- 6.5. Each replacement brake lining assembly or replacement drum brake lining shall display permanently one set of approval data;
 - 6.5.1. the approval mark;
 - 6.5.2. the date of manufacture, at least month and year, or batch number[R9001s6-14],
 - 6.5.3. make and type of brake lining.

9.5 ATVs for agriculture and forestry, Bulgaria 1

In Bulgaria there are cases of using ATVs in the agriculture and forestry. The ATVs, in principal, are subject to type - approval under Directive 2002/24/EC. The ATVs that are used in the agriculture and forestry have only one difference with category L7 – engine power more than 15 kW. So, the CoC for category L7 could not be required.

Question:

We would like to ask other Member States to share their experience if they have ATVs that are used in agricultural and forestry. What kind of document shall be required in order to certify the necessary level of safety?

TAAM Minutes:

It was agreed that a 4 wheel All Terrain Vehicle with more than 15kW could not be approved as a quadricycle under 2002/24/EC (as amended) so it would need to be considered against the requirements for M1/N1 vehicles or agricultural tractors depending on its design and intended use.

9.6 91/671/EEC: Use of integrated child restraint systems approved to ECE R44.03 or Directive 77/541/EEC, Germany 8

Question:

Is the procedure described below acceptable for the competent authorities of the Member States?

Issue:

Directive 91/671/EEC amended by Directive 2003/20/EC required for in-use vehicles the application of child restraint systems approved to the standards of UN-ECE Regulation 44/03 or Directive 77/541/EC. A German carmaker equipped vehicles in the past with integrated child restraint systems approved in accordance with UN-ECE Regulation 44/02 but the systems technically fulfil the requirements of UN-ECE Regulation 44/03.

KBA sent confirmation letters about all relevant child restraint systems and vehicle types to the TAA in May 2008. Additionally KBA informed about further measures taken by the carmaker (informing of the owners of the affected cars by the manufacturer; Insertion of a translation of the confirmation in the respective official language in the user manual by the manufacturer's workshops).

KBA asked the TAA whether all competent authorities accept this approach for their territory. KBA did not receive any comments or refusals to the intended procedure. Because of the expensive costs for the intended procedure the carmaker needs an active affirmation by the Member States authorities before launching the process.

Possible solutions:

Selection of solution		accepted	refused
A	The carmaker launches the proposed measures.		
B	The proposed measures are not sufficiently and additional measures are necessary.		

Comment:

If an authority selects solution "B", the authority should state the additional measures and for a better understanding they should also state the background for those requirements.

TAAM Minutes:

It was explained that the vehicles in question are already in service.

The meeting confirmed that according to the current provisions of Directive 91/671/EEC, as amended by Directive 2003/20/EC, the child restraint must be approved to EC R44.03 (or Directive 77/541/EEC as amended).

Therefore, even though the integral child seat described above would meet the technical requirements of ECE R44.03, it would need to formally have its approval updated from R44.02 to R44.03 in order to be acceptable under the provisions of 91/671/EEC, as amended by 2003/20/EC.

It was acknowledged that, because it is an in-use issue, this situation presents a real problem for vehicles already in service with integral child seats approved to a previous level of ECE R44.

Several delegates stated that these seats could not be used in their respective countries. Other delegates were not sure and they were requested to confirm their position to Germany by email post-meeting.

It was suggested that a proposal could perhaps be made to amend 91/67/EEC to allow acceptance of integral systems for vehicles already in use which 'fulfilled the technical requirements' of ECE R44.03 but without the need for formal certification of these particular seats.

10. NEXT MEETING

TAAM Minutes:

It was confirmed that the next three TAAM's will be scheduled as follows:

26-27 March : Bern, Switzerland

2009 Q3/Q4: Slovenia

2010 Q1/Q2: Bulgaria