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Federal Department of the Environment,
Transport, Energy and Communications DETEC

Federal Roads Office FEDRO

TYPE APPROVAL AUTHORITIES MEETING

26 & 27 MARCH 2009 - BERN, SWITZERLAND

MEETING MINUTES

Issue Date: 20 April 2009

Author:

TYPE APPROVAL AUTHORITIES MEETING
26 & 27 MARCH - BERN, SWITZERLAND

ATTENDEES

Austria

Belgium

Bulgaria

Czech Republic

Estonia

European Commission

Finland

France

Germany

Iceland

Ireland

Latvia

Luxembourg

Netherlands

Norway

Poland

Romania

Slovakia

Slovenia

Spain

Sweden

Switzerland

United Kingdom

Type Approval Authority Meeting

26 and 27 March 2009 - Bern, Switzerland

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MEETING QUESTIONS AND NOTES

1. OPENING OF THE MEETING

TAAM Minutes:

The delegates were welcomed to Bern by the meeting chairman

2. ADOPTION OF THE AGENDA

TAAM Minutes:

The meeting Agenda was presented.

The Netherlands withdrew question 5.8, Certificate of Conformity, Chapter VII, Article 18 (Netherlands 4).

Germany requested that in addition the regulation ECE R117 be discussed.

The European Commission said it would like to inform the meeting about the planned work in 2009 on vehicle legislation and the noise monitoring procedure.

3. ADOPTION OF THE MINUTES FROM EDINBURGH, SCOTLAND (9 AND 10 OCT 2008)

TAAM Minutes:

UK informed the meeting that he would be making additions to the fol-lowing items on the Edinburgh agenda:

4.2 (Leipzig Agenda Item 6.7): Commission to confirm legal position regarding manufacturer's representative based in EFTA countries

Bern Minutes: The Commission confirmed that, for EC Type Approval purposes, an authorized representative could be located in EEA territories (Iceland, Liechtenstein and Norway) but not in Switzerland.

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

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.

At the request of the Dutch delegation, the conclusion to be changed to report that no consensus was achieved.

6.3 70/156/EEC: Approval numbering for vehicle systems Directives and Regulations, UK 1

Bern Minutes: Nothing that some 1st stage approvals have already been issued with no letter shown in the approval number and others have been issued with the letter "A" included, it was confirmed that acceptable approval marking would be as follows:

Stage 1: Letter "A" or no letter at all
(e11*2006/40*706/2007A*1234*00 or e11*2006/40*706/2007*1234*00)

Stage 2: Letter "B"
(e11*2006/40*706/2007B*1234*00)

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

Bern Minutes: The Commission reported that the anticipated UN ECE review has not progressed and so the EC will now recommend to ISO that a review be conducted to update the ISO standards.

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

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 16-27 March 2009 (TAAM Bern Agenda Item 4.4)

General:

The TAAM documents should be rendered anonymous for publication on the EC web site (i.e. country of origin of the questions not visible). This means there will be two versions:
1) non-anonymous for the TAAM Meeting
2) anonymous for publication

4. FOLLOW UP ON ACTIONS FROM THE EDINBURGH MEETING

4.1 (Leipzig Agenda Item 4.6 and Edinburgh Agenda Item 4.1) (Motor Cycle Working Group and TAAM Quadracycle subgroup): Information from the Commission

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 sub-group 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 discussion of these points at the meeting of the Motor Cycle Working Group in February 2009 did not achieve any result. The points would be discussed again at the next meeting on June 4, 2009.

4.2 (Edinburgh Agenda Item 5.1) (2007/46/EC: Access to repair and maintenance information, Spain 3): The delegates share their experiences

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 type approval)
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:

There was a working group of the CEN (European Committee for Standardization) that was concerned wth this topic. The TAAM delegates were of the opinion that developments on the subject within CEN needed to be followed.

4.3 (Edinburgh Agenda Item 5.2) (2007/46/EC Annex XVII: Multi-stage EC type approval, Netherlands 2): Information from the Commission

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:

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.*

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:

Already at the last TAAM meeting in Edinburgh the European Commission had informed us that a guidance document was being prepared and the delegates had been invited to send their comments to [redacted]

The Commission informed the meeting that no comments had been received.

It was decided that this topic would be dealt with by Italy within the GRSG. For this purpose the GRSG would get in touch with the Liaison Committee of the Body and Trailer Building Industry (CLCCR).

4.4 (Edinburgh Agenda Item 9.3) (ECE R21 Annex VIII: Determination of head impact zone, Spain 4): New question from UK (UK 1)

ISSUE FOR FURTHER DISCUSSION

There has been some concern expressed that the conclusion reported for Item 9.3 in the draft minutes of the Edinburgh TAAM could lead to some practical problems with vehicles in service.

For example, a vehicle fitted with a child seat in the front passenger position would, of course, have the air bag deactivated by the driver at the beginning of the journey. However, if the driver then stopped (e.g. to re-fuel or call into a shop) the engine would be temporarily switched off. Then when the engine is re-started the airbag would automatically re-activate.

The driver would therefore have to specifically de-activate the airbag again to protect the child. There is a risk that the driver might forget to do this.

VCA therefore request a further discussion to refine the TAAM opinion on this item.

Extract from draft Report for TAAM Edinburgh:

Edinburgh Item 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 telltail 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 discussions showed the definition of "permanent deactivation" was unclear.
It was proposed to ask the GRSP to clarify this point.

4.5a (Edinburgh Agenda Item 5.11) (2007/46/EC Annex IV Appendix to part 1: M1 small series technical requirements, UK 2, Netherlands 1, Germany 7):

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).

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.

INTRODUCTION

It was originally 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 at the Leipzig TAAM in April 2008. There was then further discussion at the Edinburgh TAAM in October 2008 when it was agreed that the inputs of interested Member States should be co-ordinated in an attempt to achieve a common approach by early 2009.

With this objective in mind, those Member States that had already provided some input decided to get together for an informal meeting in order to develop a common proposal that could then be circulated to all TAAM members prior to the next TAAM in Switzerland. The informal EC Small Series meeting was held in Luxembourg on 9 &10 December 2008 and the attendees were Belgium, European Commission, France, Germany, Luxembourg, Netherlands, Spain and United Kingdom.

The minutes from that meeting were then circulated to all TAAM members on 23 December 2008. Ireland responded to confirm its agreement with the proposals. No other responses were received and it is therefore anticipated that there is general agreement with the proposals which are now presented to the TAAM in Bern for formal concurrence.

GENERAL PRINCIPLES

Some general principles are proposed for as follows:

- The intention of the Small Series derogations is to reduce the cost of approval for Small Series manufacturers.

- 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.

- Manufacturers must demonstrate competence to conduct un-witnessed self-tests. This capability will be audited by TAA.

- Acceptance of un-witnessed test data by TAAs will be subject to assessment of the manufacturers test procedures against the main requirements of EN ISO/IEC 17025:2005

- At the discretion of the TAA, the manufacturer's test data for Category C subjects could also be accepted from competent third parties.

- The acceptance criteria for Category C subjects are only valid for those manufactures which satisfy the respective TAA that they are capable and competent to conduct the necessary tests and provide reliable and trustworthy test data in an acceptable format. This is also the case for third parties used by the manufacturer for these tests.

- In all cases the TAA has the right to require further verification of manufacturer's test data. This can include some witnessed testing when required

- The TAA also has the right to carry COP tests (physical COP tests may be carried out even when the original approval was granted on the basis of calculations)

- Multi-stage approvals would be possible under the EC Small Series scheme but then the requirements of 2007/46/EC Annex XVII must be fully met

CATEGORY 'C' SUBJECT REQUIREMENTS

The requirements for subjects identified as Category 'C' (in Annex IV Appendix to Part 1) are proposed as follows:

Item 5: Steering Effort

Summary of 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 the vehicle's maximum speed (inc self centering requirement)
- General requirements for robust construction of steering system
- Specific requirements for electric/electronic steering systems

Acceptance Criteria
- Manufacturer's test for failed condition only
- Manufacturer's declaration for safe handling and construction
- Manufacturer's declaration for safe and robust construction of steering system
- In the case of electric/electronic steering systems TAA will require witnessed tests to be conducted according to the full requirements of ECE R79.01

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Item 6: Door Latches & Hinges

Summary of Technical Requirements
- General requirements for design and functionality of door latches and hinges
- Strength test for latches
- Strength test for hinges
- 30g deceleration test or calculation
- Entry/exit step height requirement

Acceptance Criteria
- Manufacturer to confirm compliance with design, construction and entry/exit criteria.
- Manufacturer to supply data to demonstrate compliance with strength requirements for door latches and hinges.
- Manufacturer to provide 30g calculations data for door opening mechanism (door handle, latch and linkage system) for verification. Otherwise full sled test data to be supplied.

Alternatively:
- Carryover door locks and hinges and door opening mechanisms/linkages from vehicle with full EC approval provided geometry of the installation is the same.

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Item 10: EMC (Radio Suppression)

Summary of Technical Requirements
- Approval based either on
    - Separate approvals for all electrical/electronic systems or electrical sub assemblies
      or
    - Vehicle tests
- The vehicle and component tests cover Broadband Emissions, Narrowband Emissions and Immunity

Acceptance Criteria

- If approval not based on separate (Category A) test evidence for all relevant electrical/electronic systems or electrical sub assemblies, Manufacturer must provide vehicle test data to demonstrate compliance with full Broadband Emissions, Narrowband Emissions and Immunity test requirements.

Item 12: Interior Fittings

Summary of 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

Acceptance Criteria
- Manufacturer to supply data (drawings photos etc) to demonstrate compliance with radii and protrusion requirements for switches, controls and general interior fittings.
- Manufacturer to supply data to demonstrate compliance with requirements for safe operation of electric windows
- Exemption may be provided from impact tests if manufacturer provides suitable justification

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Item 14: Protective Steering

Summary of 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

Acceptance Criteria
- Manufacturer to provide test data to demonstrate compliance with barrier impact, body block and head impact test requirements.
- Body block and head impact tests not required if the steering wheel is fitted with an airbag or if an approved ('e marked') steering wheel is used.

Notes from the Luxembourg Small Series meeting:

Some TAAs felt that, at the discretion of the TAA, exemption may be allowed from the physical barrier impact test if manufacturer provides suitable justification (e.g. possible read across from full EWVTA vehicle with same/similar front structure).
However some TAAs felt that, since this is the only crash test in the EC Small Series scheme, it should be a full physical barrier test.
A key concern is that, without a mandatory crash test, the Small Series scheme could allow M1 classification for vehicles previously classified as Quadricycles. This would then allow them to bypass their current power and unladen mass restrictions.
It was proposed that this item be put to TCMV.

Item 15: Seat Strength

Summary of 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 during 20g deceleration
- Impact test for headrests and rear parts of seats
- Radius requirements for rear parts of seats
- Dimensional requirements for headrest

Acceptance Criteria
- Manufacturer to provide test data to demonstrate compliance with seat backrest and headrest strength (moment) test
- Manufacturer to supply data to demonstrate compliance with dimensional and radii requirements
- Manufacturer to provide test data to demonstrate compliance with 20g deceleration test requirements.
- Exemption may be provided from impact tests if manufacturer provides suitable justification

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Item 16: Exterior Projections

Summary of Technical Requirements
- Radius requirements for contactable surfaces
- Dimensional limitations for gaps and air intakes
- Specific radii and protrusion requirements for specific items (e.g. door handles, fuel caps, hinges, bumpers, wheels etc)

Acceptance Criteria
- Manufacturer to supply data (drawings photos etc) to demonstrate compliance with all requirements. TA can then conduct examination of specific areas considered to be critical.

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Item 34: Defrost Demist

Summary of 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)

Acceptance Criteria
- No performance tests required (covered by manufacturer's confirmation)
- 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

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Item 35: Wash/Wipe

Summary of 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)
- Dirt clearance capability test
- Cold chamber test to check performance at –18 °C
- High speed performance check
- Specification and performance criteria for windscreen washer system components

Acceptance Criteria
- Vehicle must be fitted with a windscreen wipers and washers
- Manufacturer's data to show trace of swept area in relation to A and B zones
- Manufacturer's data to show frequencies and auto-park compatibility
- Cold chamber test not required (covered by manufacturer's confirmation)
- Dirt clearance test not required (covered by manufacturer's confirmation)
- No washer system component tests (covered by manufacturer's confirmation)
- High speed performance check not required (covered by manufacturer's confirmation)

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Item 36: Heating Systems

Summary of Technical Requirements
- Requirement for all vehicles to be specified with a heater for the passenger compartment
- 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.

Acceptance Criteria
- Vehicle must be fitted with heater for the passenger compartment
- No danger of polluted air entering passenger compartment from heating system
- No contact with hot parts
- Combustion heaters must be fully approved (e marked)

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Item 40: Engine Power

Summary of 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)

Acceptance Criteria
- Accept engine bench test data from engine manufacturer
- Accept conversion from vehicle dynamometer test instead of engine bench test

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Item 44: Masses & Dimensions

Summary of Technical Requirements
- Mass checks to verify that the manufacturer's quoted running order mass (without driver)
- Mass checks to verify that fully loaded vehicle (including tow bar load, when applicable) does not exceed stated maximum axle and gross vehicle masses
- Hill start test at maximum mass
- Measurement of vehicle's overall dimensions

Acceptance Criteria
- Manufacturers own data accepted
- Fully detailed Mass calculation sheet required
- Hill start verification test not required (covered by manufacturer's confirmation)

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Derek Jones (VCA) and Mark Wummel (KBA)
20 February 2009

4.5b (Edinburgh Agenda Item 5.11) (2007/46/EC Annex IV Appendix to part 1: M1 small series technical requirements, UK 2, Netherlands 1, Germany 7):

Footnote	No.	Approval object	Single legal act	Summary of essential technical requirements	Minimum requirements → Maximum requirements: Manufacturer's confirmation	Adoption of approved parts (comparable installation)	Calculation and/or CAD-proof	Real Test	Responsibility for technical report: Manufacurer (Recognised for small series self-testing)	Technical Service (designated by TAA)	Remarks
											4.5b
X		parts and stu's		Full compliance with regulatory act is required; EC type-approval certificate has to be issued; conformity of production shall be ensured.				X		X	
A		general		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.				X		X	
B		general		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.				X	X	X	
C	5.	Steering effort	70/311/EEC	Limit for effort required at steering wheel rim when conducting prescribed manoeuvres (with power assistance in both operational and failed condition)				X	X	X	Test for failed condition only
				Requirements for safe handling/behaviour of steering up to vehicle's max speed (inc self centering requirement)	X				X	X	
				General requirements for robust construction of steering system	X				X	X	
				Specific requirements for electric/electronic steering systems				X		X	Witnessed test when applicable
	6.	Door latches and hinges	70/387/EEC	General requirements for design and functionality	X				X	X	Alternatively carryover door locks and hinges and door opening mechanisms/linkages from vehicle with full EC approval provided geometry of the installation is the same
				Strength test for latches			X		X	X	
				Strength test for hinges			X		X	X	
				30 g deceleration test			X		X	X	
				Entry/exit step height requirement	X				X	X	
	10.	EMC (Radio suppression)	72/245/EEC	Approval based either on separate approvals for all electrical/electronic systems or electrical sub assemblies or vehicle tests				X	X	X	
				The vehicle tests cover Broadband Emissions, Narrowband Emissions and Immunity				X	X	X	
	12.	Interior fittings	74/60/EEC	Radii and protrusion requirements for switches, controls and general interior fittings			X		X	X	Manufacturer to supply data (drawings photos etc) to demonstrate compliance with radii and protrusion requirements for switches, controls and general interior fittings. Exemption may be provided from impact tests if manufacturer provides suitable justification
				Requirements specified for designated sections of the interior (upper dashboard, lower dashboard, roof, rest of vehicle interior etc)			X		X	X	
				Impact tests requirements for upper dashboard (head impact zone) and other items (including the rear parts of seats)				X	X	X	
				Specific requirements for safe operation of electric windows	X				X	X	
	14.	Protective steering	74/297/EEC	Barrier Impact test (not required if Vehicle also approved to 96/79/EC)				X	X	X	If there are exemptions from crash, to be decided by TCMV
				Body block impact against steering wheel				X	X	X	not required if the steering wheel is fitted with an airbag or if an approved ('e marked') steering wheel is used
				Head impact against steering wheel				X	X	X	
	15.	Seat strength	74/408/EEC	Strength tests for seat backrest and headrest				X	X	X	Exemption may be provided from impact tests if manufacturer provides suitable justification
				Dynamic sled test to check security of seat mounts in vehicle floor and to check security of seat adjustment/locking mechanisms during 20g deceleration				X	X	X	
				Impact test for headrests and rear parts of seats				X	X	X	
				Radius requirements for rear parts of seats			X		X	X	
				Dimensional requirements for headrest			X		X	X	
	16.	Exterior Projections	74/483/EEC	Radius requirements for contactable surfaces			X		X	X	Manufacturer to supply data (drawings photos etc) to demonstrate compliance with all requirements. TA can then conduct examination of specific areas considered to be critical.
				Dimensional limitations for gaps and air intakes			X		X	X	
				Specific radii and protrusion requirements for specific items (e.g. door handles, fuel caps, hinges, bumpers, wheels etc)			X		X	X	
	34.	Defrost Demist	78/317/EEC	Cold chamber test (–8 °C. or –18 °C) to measure time to clear ice from windscreen (in specified A and B vision zones)	X				X	X	No performance tests required. 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
				Cold chamber test (–3 °C) to measure time to clear steam/mist from windscreen (in specified A and B vision zones)	X				X	X	
	35.	Wash/Wipe	78/318/EEC	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)	X				X	X	Vehicle must be fitted with a windscreen wipers and washers. Manufacturer's data to show trace of swept area in relation to A and B zones. Manufacturer's data to show frequencies and auto-park compatibility. Cold chamber test not required. Dirt clearance test not required. No washer system component tests.
				Dirt clearance capability test	X				X	X	
				Cold chamber test to check performance at –18 °C	X				X	X	
				High speed performance check	X				X	X	
				Specification and performance criteria for windscreen washer system components	X				X	X	
	36.	Heating Systems	2001/56/EC	Requirement for all vehicles to be specified with a heater for the passenger compartment	X				X	X	Vehicle must be fitted with heater in passenger compartment. No danger of polluted air entering passenger compartment from heating system. No contact with hot parts. Combustion heaters must be fully approved (e marked).
				The heated air entering the passenger compartment shall be no more polluted than the air at the point of inlet to the vehicle	X				X	X	
				The vehicle occupants must not be able to come into contact with parts of the vehicle (or heated air) liable to cause burns	X				X	X	
				The exhaust emissions from combustion heaters must be within acceptable limits	X				X	X	
	40.	Engine Power	80/1269/EEC	Engine bench test to determine engine net power curve	X				X	X	Accept engine bench test data from engine manufacturer. Accept conversion from vehicle dynamometer test instead of engine bench test.
				Measured results to be within 2% of manufacturer's declared value for maximum power at declared engine speed (4% at all other speeds)	X				X	X	
	44.	Masses & Dimensions	92/21/EC	Mass checks to verify the manufacturer's quoted running order mass (without driver)	X				X	X	Manufacturers own data accepted.
				Mass checks to verify that fully loaded vehicle (including tow bar load, when applicable) does not exceed stated maximum axle and gross vehicle masses	X				X	X	Manufacturers own data accepted. Fully detailed Mass calculation sheet required.
				Hill start test at maximum mass	X						Hill start verification test not required.
				Measurement of vehicle's overall dimensions	X				X	X	Manufacturers own data accepted.
		EC-WVTA test report according to Annex V			□					X	

TAAM Minutes:

The document was accepted as it stood as a guideline by the TAAM delegates.

The Commission was also supportive of the document prepared in Luxembourg. The Commission was willing to include those requirements in the Appendix to Annex IV. It was also in favour of including technical requirements in respect of N1 vehicles as well. The Commission took note of the wish of the majority of participants and would consider the publication of a guideline on its internet site.

The decision on this matter had not yet been taken, however. It would be helpful if the secretary of the meeting in Luxembourg could make available to the Commission a document suitable for publication.

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

5.1 2007/46/EC: Designation and notification of Technical Services, European Commission 1

1. Designation and notification of Technical Services

As Directive 70/156/EEC is repealed with effect from 29 April 2009, and thus the new Framework Directive (Directive 2007/46/EC of the European Parliament and of the Council of 5 September 2007 establishing a framework for the approval of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles) will be the only applicable text, we would like to take this opportunity to draw attention to Chapter XVI (Designation and Notification of Technical Services) of said Directive.

Article 43, Procedures for notification, states:

"1. Member States shall notify to the Commission the name, the address including electronic address, the responsible persons and the category of activities with respect to each designated technical service. They shall notify it of any subsequent modifications thereto.

The notification act shall state in respect of which regulatory acts the technical services have been designated.

2. A technical service may conduct the activities described in Article 41 for the purposes of type-approval only if it has been notified beforehand to the Commission.

[...]

5. The Commission shall publish a list and details regarding the approval authorities and technical services on its web-site."

In this context, we would like to ask the meeting participants to check the entry for their own Member State on the web site http://ec.europa.eu/enterprise/automotive/pagesbackground/technical_services.htm

and to see whether the information is correct and up to date.

Commission européenne, B-1049 Bruxelles / Europese Commissie, B-1049 Brussel - Belgium. Telephone: (32-2) 299 11 11.
Office: BREY 10/026. Telephone: direct line (32-2) 2965260. Fax: (32-2) 2969637.

TAAM Minutes:

The European Commission requested the delegates to check by April 29, 2009 whether the list of notified technical services was up to date.

5.2 2007/46/EC: Vehicle category, Sweden 1

DIRECTIVE 2007/46/EC

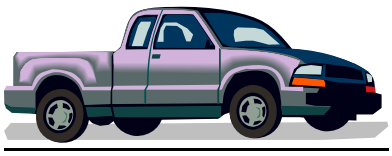
Annex II
C. Definition of type of bodywork
3. Motor vehicles of category N

BA	Lorry	See Directive 97/27/EC of the European Parliament and of the Council of 22 July 1997 relating to the masses and dimensions of certain categories of motor vehicles and their trailers (1) Annex I item 2.1.1
BB	Van	Lorry with the cab integrated into the body
BC	Semi-trailer towing vehicle	See Directive 97/27/EC Annex I item 2.1.1
BD	Trailer towing vehicle (road-tractor)	See Directive 97/27/EC Annex I item 2.1.1

— However, if a vehicle defined as BB with a technically permissible maximum mass not exceeding 3500 kg:
— has more than 6 seating positions excluding the driver
or
— meets both of the following conditions:
(i) the number of seating positions, excluding the driver, is not more than 6 and
(ii) $P – (M + N \times 68) \leq N \times 68$
this vehicle is not considered to be a vehicle of category N.
— However, if a vehicle defined as BA, BB with a technically permissible maximum mass exceeding 3500 kg,
BC or BD meets at least one of the following conditions:
(i) the number of seating positions, excluding the driver, is more than 8 or
(ii) $P – (M + N \times 68) \leq N \times 68$
this vehicle is not considered to be a vehicle of category N.

P = technically permissible maximum laden mass in kg
M = mass in running order in kg
N = number of seating positions excluding the driver.

QUESTION / PROBLEM /CONCERN:
Is this a vehicle of category N? Technically permissible maximum laden mass (P): 3 490 kg Number of seating positions excluding the driver (N): 4 Mass in running order (M): 3 100 kg



	A	Yes, it is a vehicle of category N. The vehicle is designed and constructed for the carriage of goods	
	B	No. The vehicle is not intended for carriage of gods since: $P - (M + N \times 68) \leq N \times 68$	

Type approving authority "e"	5

Selection of solution		
	A	
	B	

TAAM Minutes:

The discussions showed that the text of the Directive was unclear. Both M1 and BA were possible, depending on the interpretation.

It was decided that the text had to be revised by the European Commission.
The point would be taken up again at the next TAAM meeting.

5.3 2007/46/EC: Devices for securing load, Sweden 2

Annex II

A. DEFINITION OF VEHICLE CATEGORY

2. Category N: Motor vehicles with at least four wheels designed and constructed for the carriage of goods.

Annex II

C. DEFINITION OF TYPE OF BODYWORK

3. Motor vehicles of category N

BA	Lorry	See Directive 97/27/EC of the European Parliament and of the Council of 22 July 1997 relating to the masses and dimensions of certain categories of motor vehicles and their trailers (1) Annex I item 2.1.1
BB	Van	Lorry with the cab integrated into the body
BC	Semi-trailer towing vehicle	See Directive 97/27/EC Annex I item 2.1.1
BD	Trailer towing vehicle (road-tractor)	See Directive 97/27/EC Annex I item 2.1.1

QUESTION / PROBLEM /CONCERN:

A vehicle of category N shall be designed and constructed for the carriage of goods.
Would you issue a type approval according to 2007/46/EC for a vehicle type with bodywork BB (cab integrated into the body) if it has no equipment for securing load e.g. retaining device (partition), anchorage points etc.?

	A	Yes, we would issue an N-category type approval. The directive 2007/46/EC has no requirement regarding equipment for securing load.	
	B	No, we would not issue an N-category type approval. A vehicle without equipment for securing load is not designed and constructed for the carriage of goods.	

Type approving authority "e"	5

Selection of solution		
	A	
	B	

TAAM Minutes:

The TAAM delegates decided in favour of solution A. Country-specific regulations had to be observed, however.

5.4 2007/46/EC: Chapter 1, Article 3 Definitions, Norway 1

Question:

This article no. 27 defines *Manufacturer*.

Is it necessary for a manufacturer of a subsequent stage (e.g. the manufacturer of a caravan-body or a truck-body) to have his own WMI-code? (and thus the possibility to supply his part/stage with a 17 digits/letters V.I.N. if necessary)

Type approval authority "e"	16

	Possibilities of solution	**Accepted**	**Refused**
A	Manufacturers building subsequent stages of a vehicle do NOT need to have their own WMI-code.		
B	Manufacturers building subsequent stages of a vehicle need to have their own WMI-code.		

TAAM Minutes:

The TAAM delegates decided in favour of solution A.

5.5 2007/46/EC: Validity of the European Whole Vehicle Type Approval, Poland 1

Background:

The item (2) of the Preamble of the Framework Directive 2007/46/EC says:
"For the purposes of the establishment and operation of the internal market of the Community, it is appropriate to replace the Member States' approval systems with a Community approval procedure based on the principle of total harmonisation."

Also, the item (9) of the Preamble of the same Directive says:
"Pending application of the Community vehicle type-approval procedures to categories of vehicles other than M_1, Member States should be allowed to continue to grant vehicle type-approvals on a national basis, and transitional provisions should be laid down accordingly."

The enforcement timetable in the Annex XIX in its "New types of vehicles - Optional" column shows the date of 29 April 2009 for all vehicle categories other than M_1.

It therefore appears that obtaining the European Whole Vehicle Type-Approval certificate after the date of 29 April 2009, but before the end of transitional period, i.e. not later than the date specified in the "New types of vehicles - Obligatory" or "Existing types of vehicles - Obligatory" (columns 2 and 3 - depending on the date adopted in the Member State national legislation transposing the Framework Directive) is an option for a vehicle manufacturer.

Question:

Does it mean that obtaining the European Whole Vehicle Type-Approval certificate makes it impossible for the remaining EU member states to require a national Whole Vehicle Type-Approval certificate be obtained for the same vehicle type?

Possibilities of solution		Comments
A	First option is accepted	Yes, because mutual recognition of European Whole Vehicle Type-Approval certificates is one of basic principles of operation of the internal market of the Community. Also, it would be against one of the basic rules of all EU directives and UN ECE Regulations forbidding to issue another type-approval certificate for the same vehicle (or component) type.
B	Second option is accepted	No, because [*please specify...*]

TAA code: **„e" „E"** **20**

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

TAAM Minutes:

The TAAM delegates decided in favour of solution A.

5.6 2007/46/EC: Transitional provisions for old approvals, extensions and CoC, Germany 1

Issue

Art. 45 (5) says: This Directive shall not invalidate any EC type-approval granted to vehicles of category M1 before 29 April 2009 nor prevent the extension of such approvals.

According to Art. 49 the old framework Directive 70/156/EEC will be repealed with effect of 29 April 2009.

Art 49 last sentence says: References to the repealed Directive shall be construed as references to this Directive and shall be read in accordance with the correlation table set out in Annex XXI.

Question:

1. How can extensions to existing approvals according to 70/156/EEC be granted after 29 April 2009, when the old framework Directive is invalid already?
2. Which Annexes should be the basis then?
3. Which CoC-format must be used then?

Possibilities of solution		Comments
1A	According to Art. 45 (5) extensions of old approvals can still be granted. Legal basis is the old framework Directive 70/156/EEC in the last version.	
1B	According to Art. 45 (5) extensions of old approvals can still be granted. Legal basis will be the Directive 2007/46/EC using the correlation table set out in table XXI.	
1C	Other interpretation	
2A	The Annexes of the last version of 70/156/EEC must be used.	
2B	The valid Annexes of 2007/46/EC must be used	
2C	Other interpretation	
3A	The CoC must have the format according to the last Annex IX of 70/156/EEC	
3B	The CoC must have the format according to the actual valid Annex IX of 2007/46/EC with respect to the transitional period in there.	
3C	Other interpretation	

Type approving authority "e"			
Selection of solution		accepted	refused
	1A		X
	1B	X	
	1C		X
	2A		X
	2B	X	
	2C		X
	3A		X
	3B	X	
	3C		X

TAAM Minutes:

The TAAM delegates decided in favour of the following solutions:
- **1B**
- **2B, as with 1B using the correlation table according to annex XXI**
- **3B; CoC in the old format were still valid until April 29, 2010**

5.7 2007/46/EC: Annex XVII - Multi stage EC type-approval, Norway 2

Directive: 2007/46/EC (Motor vehicles)
Subject: Annex XVII – Multi stage EC type-approval

Question:

According to annex XVII no. 4.2 Additional manufacturer`s plate, all the manufacturers shall supply plates which shows vehicle identification number.

Is this referring to the V.I.N. of the base vehicle or new V.I.N. from the respective manufacturers?

The question is related to 4.1 (a), when the V.I.N. of the base vehicle shall be retained.

The text seems to mean the V.I.N. from the base vehicle shall be used for all the manufacturers, but for motor-caravans with multi-stage t.a. we often recognise that the plates from 2. and 3. manufacturer are marked with new V.I.N., even without WMI-code.

Type approval authority "e"	16

	Possibilities of solution	**Accepted**	**Refused**
A	The V.I.N. from the base vehicle shall be retained during all the stages, and shall be market at the plates from the subsequent manufacturers.		
B	The subsequent manufacturers may mark their plates with their own V.I.N., even without WMI-code/17 digits/letters.		

TAAM Minutes:

The TAAM delegates decided in favour of solution A.

5.8 2007/46/EC: Certificate of Conformity (CoC) Chapter VII, Article 18, Netherlands 4

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-004

v1.00 – 10 March 2008

Directive or Regulation number:
Framework Directive 2007/46/EC
Subject:
Certificate of Conformity (COC)

Reference to Annex, etc in the Directive or Regulation:
Chapter VII, Article 18

Text:
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. Annex IX: EC Certificate of Conformity **0.1. Make (Trade name of manufacturer)** Most manufactures use only one “Make” on their certificates of conformity, but we also see certificates of conformity with more than one “Make” (Sometimes even up to more than 20). It seems logical to have only one “Make” as each vehicle is only accompanied by one unique Certificate of Conformity.

Question:
Is it allowed to have more than one “Make” on a Certificate of Conformity ?

Solution:		
A	Yes	It is allowed
B	No	It is not allowed

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

Authority:	
Type approval Authority e/E	**4**

Remarks:

TAAM Minutes:

The question was withdrawn at the beginning of the meeting by the Netherlands.

5.9 2007/46/EC: Multistage type-approvals after an amendment of the provisions, Netherlands 1

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-001

v1.00 – 10 March 2008

Directive or Regulation number:
Framework Directive 2007/46/EC
Subject:
Multistage type-approvals after an amendment of the provisions.

Reference to Annex, etc in the Directive or Regulation:
-

Text:
In case of a multi stage type approval procedure it can happen that a stage manufacturer amends the construction of a vehicle so that the approvals of a previous stage are affected. When the amendments are beyond the limits of the previous approval, even when these are minor amendment like attaching conspicuity markings, a new approval has to be granted. However when in the mean time the provisions of the relevant separate directive have been changed the question will raise which provisions have to be met. Shall the new approval be based on the most recent provisions or can we use the same provisions on which the previous stage is based? The application of the most recent provisions might result in fundamental amendments to the vehicle like the mounting of head lamp levelling devices or the installation of ABS.

Question:
Which provisions are applicable when a second stage manufacturer amends the vehicle on topics that are already covered by the first stage type approval?

Solution:		
A	The latest provisions shall be applied to all parts that are related to the relevant separate directive(s).	
B	The latest provisions shall only be applied to those parts that are amended or added to the previous stage; this option can only be used as long as the previous approval has not lost its validity for the registration of new vehicles.	

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

Authority:	
Type approval Authority e/E	**4**

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-001

v1.00 – 10 March 2008

Remarks:

TAAM Minutes:

The TAAM delegates decided in favour of solution B.

5.10 2007/46/EC: Multistage type-approvals, Netherlands 2

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-002

v1.00 – 10 March 2008

Directive or Regulation number:
Framework Directive 2007/46/EC
Subject:
Multistage type-approvals

Reference to Annex, etc in the Directive or Regulation:
-

Text:
Based on framework directive 70/156/EEC a multi-stage EC type-approval for a special purpose vehicle of category M1 is possible without a base type-approval for the first stage. It is sufficient to have a Certificate of Origin for the first stage. Directive 70/156/EEC is repealed with effect from 29 April 2009, according to Article 49 of Directive 2007/46/EC. However, there is no reference to Annex XVIII in one of the Articles of Directive 2007/46/EC, which indicates that the use of a Certificate of Origin is no longer valid.

Question:
Is it possible to obtain a multi-stage EC type-approval in accordance with the above mentioned procedure of Directive 70/156/EEC?

Solution:		
A	Yes	Annex XVIII can be used as a substitution for a first stage Approval
B	Yes/No	Until 29-10-2010 (being the date on which ECWVTA becomes mandatory for incomplete and complete vehicles of category N1) it is possible to use Annex XVIII as a substitution for a first stage Approval if the completed vehicle is a “Special purpose vehicles” of the category M1 as mentioned in Annex XI. In all other cases a first stage Approval has to be issued
C	No	After 29 April 2009 it is mandatory to have an EC type-approval certificate for the first.

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

Authority:	
Type approval Authority e/E	**4**

Remarks:
We would like to know the opinion of all Member States

TAAM Minutes:

The TAAM delegates decided in favour of solution B, with the exception of Spain.

Spain had made an enquiry to the European Commission but had not yet received a reply. Spain therefore abstained from voting.

5.11 2007/46/EC: Multistage type-approvals, Netherlands 3

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-003

v1.00 – 10 March 2008

Directive or Regulation number:
Framework Directive 2007/46/EC
Subject:
Multistage type-approvals

Reference to Annex, etc in the Directive or Regulation:
-

Text:
The possibility exists to have a multi-stage EC type-approval, in which the first stage is approved in accordance with framework directive 70/156/EEC and the second and following stages are issued after 29 April 2009. As an example in the next stage the vehicle will be converted to run on LPG

Question:
Is it possible to issue a second and/or following stage Approval according 2007/46/EC while the base Approval is according 70/156/EEC?

Solution:		
A	No	All stages have to meet the requirements of frame-work directive 2007/46/EC
B	Yes	The first stage is allowed to meet the requirements of framework directive 70/156/EEC, the second and following stages have to meet the requirements of framework directive 2007/46/EC

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

Authority:	
Type approval Authority e/E	**4**

Remarks:

TAAM Minutes:

The TAAM delegates decided in favour of solution B.

5.12 2007/46/EC: Legal framework for the placing on the market of electric vehicles, European Commission 2

1. Legal framework for the placing on the market of electric vehicles

From 29 April 2009, the new Framework Directive 2007/46/EC on the type-approval of vehicles will be applicable. Contrary to the currently applicable Framework Directive 70/156/EEC, it does not exclude electric vehicles from its scope and therefore a manufacturer may request an EC type-approval for such vehicles. However, there are no specific technical requirements in the type-approval legislation to deal with the specific characteristics of electric vehicles. However, the Commission services are planning to mandate the application of UN/ECE Regulation No. 100[1] for the EC type-approval of electric vehicles. Article 34 of the Framework Directive, which prescribes the procedure of application of UNECE Regulations for vehicle type-approval at Community level, will constitute a legal basis for this process.

At the same time, there is a possibility of conflict or ambiguity between the above Framework Directive and Directive 2006/95/EC (Low Voltage Directive - LVD). Electric vehicles are not clearly excluded from the scope of LVD.

It therefore needs to be established how the current legal instruments should be applied during the transitional period until the application of UN/ECE Regulation No. 100 for vehicle type-approval.

Proposal

The Commission services are proposing the following approach, which is considered compliant with the spirit of the relevant legislative acts:

(a) Member States shall consider that the LVD is not applicable to electric vehicles (i.e. notably to the high voltage components to be used in electric vehicles) when placed on the EU market.

(b) Type-approval authorities shall apply UNECE Regulation 100 for granting EC type-approval during the interim period until a legislative act on mandating its application is adopted.

(c) Chargers of the batteries of electric vehicles shall always be considered as electrical equipment falling within the scope of application of the LVD.

TAAM Minutes:

The GRSP (ELSA group) was in the process of revising regulation ECE R100.

The TAAM delegates therefore decided that until this revision was completed, an attempt should be made to obtain approval according to ECE R100 from the manufacturers (not a must).

[1] This regulation covers the construction, functional safety and hydrogen emissions of electric vehicles http://www.unece.org/trans/main/wp29/wp29regs81-100.html

5.13 2007/46/EC: New type implementation date for vehicles without national approval, France 1

- **Regulation number :**

Directive 2007/46/EC amended EC/1060/2008 establishing a framework for the approval of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles.

- **Text of Directive 2007/46/EC amended EC/1060/2008**

Annex II / Definition of vehicle categories and vehicle types

Annex XIX / Timetable for the enforcement of this directive in respect of type-approval

- **Issue**

Some categories of vehicles are exempted of national approval. For instance, trailers which have a MMTA ≤ 500kg do not required a national type approval in France. However, those vehicles are in the scope of directive 2007/46/EC and have to be approved under a WVTA.
Which WVTA implementation date will you required for a vehicle which had no obligation of national approval previously?

		Possibilities of solution	**Comments**
	A	The implementation date for a vehicle which had no obligation of national approval will be the new type date according to annex XIX of 2007/46/EC	As vehicle type is not approved before, we can't know if it is a new type or an existing type.
	B	The implementation date for a vehicle which had no obligation of national approval will be the existing type date according to annex XIX of 2007/46/EC	

Type approving authority « e »	2

Selection of solutions		Accepted	Refused
	A		X
	B	X	

TAAM Minutes:

The TAAM delegates decided in favour of solution B.

5.14 2007/46/EC: Implementation of the General Safety Regulation, European Commission 4

1. Introduction

The simplification objectives of the General Safety Regulation are the following:

- ☐ Repeal 50 existing Directives (and more than 100 implementing measures).
- ☐ Update the requirements contained in the existing directives.
- ☐ Avoid duplication of EC requirements and UNECE ones.

According to Article 13 of the compromise text of the Regulation agreed by Council and EP, the implementing measures of the General Safety Regulation have to be adopted by 31 December 2010, with the exception of the measures concerning Advanced Emergency Braking Systems and Lane Departure Warning Systems, which have to be adopted by 31 December 2011.
As part of the implementation process, it is foreseen to make mandatory a number of UNECE Regulations whose content is equivalent to that of Directives which are repealed by the General Safety Regulation.
Given the tight deadlines for the adoption of the implementing measures, it is necessary to start the implementation process as soon as possible.

2. Issues covered by UNECE Regulations

2.1 Introduction

42 Directives which will be repealed by the General Safety Regulation contain requirements equivalent to those of UNECE Regulations. It is foreseen to replace these Directives by the corresponding UNECE Regulations, which will be made mandatory according to Article 4(4) of Decision 97/836/EC and will be listed in Annex IV of the General Safety Regulation. The compromise text of the Regulation agreed by Council and EP foresees that vehicle manufacturers can type-approve in accordance with the General Safety Regulation, where appropriate, **directly by means of obtaining approval to the relevant UNECE Regulation** and that **type-approval in accordance with the UNECE Regulations listed in Annex IV of the General Safety Regulation shall be considered as EC type-approval**.
Therefore, not only the duplication of technical requirements (EC requirements on one hand and UNECE requirements on the other hand) will be avoided, but there would not be duplication of administrative procedures either. This in line with the recommendations of the CARS 21 High Level Group.
The fact that it has been decided to achieve the above simplification objective by way of the General Safety Regulation rather than by simply applying the relevant provisions of the Framework Directive should not imply any practical difference for manufacturers. This choice has only been motivated by the need to have a safeguard clause in the case the UNECE Regulations, which will have been made mandatory, would be deemed in the future inappropriate to fulfil EC objectives. Indeed, though the necessity to legislate autonomously on issues covered by UNECE Regulations might be remote, it is important not to relinquish the Community's instruments for achieving its goals in certain priority areas, such as safety or environmental protection. In case in the future the need should be felt to legislate autonomously at EC level, it would be possible to adopt EC measures through comitology, since the General Safety Regulation empowers the Commission to do so.
Annex 1 to this paper contains an indicative list of UNECE Regulation which we consider could be made mandatory.

2.2 Issues to be addressed

In order to make UNECE Regulations mandatory there are a number of issues which need to be solved.

☐ Differences in scope

First of all, it is necessary to make it sure that all the requirements set out in the existing EC Directives, whose repeal is foreseen in the General Safety Regulation, are covered by the requirements in the UNECE Regulations that will then become the only option for type-approval. In most of the cases, the content of the EC Directives and the corresponding UNECE Regulations is equivalent. There are, however, a few cases where it would be necessary to amend the UNECE Regulations to add requirements that are only included in the EC Directives. Such amendments should be agreed as soon as possible so that the deadline set out in the General Safety Regulation for adoption of the implementing measures can be met.
Following a preliminary analysis, the Commission intends to table amendments to the following UNECE Regulations:

1. R 11 on Door latches and hinges: The scope of application should be extended to N2 and N3 vehicles; requirements on access-steps/running boards should be added;

2. R 80 on Seat strength: The scope of application should be aligned to that of R 17;

3. R 58 on Rear protective devices: Requirements on ground clearance should be added;

4. R 89 on Speed limitation devices: The scope of application should be extended to M2 vehicles.

It is not excluded that amendments to other UNECE Regulations would be needed. Contributions from Member States and stakeholders in this respect are welcome.
Furthermore, the General Safety Regulation foresees that implementing measures on cab strength should be adopted, taking account of UNECE Regulation 29. Currently, amendments to UNECE Regulation 29 are being discussed in GRSP and the Commission intends to propose EC's accession to this Regulation, only once these amendments are finalised. In order for this UNECE Regulation to be made mandatory by the deadline set out in the General Safety Regulation for adoption of the implementing measures, it would be necessary to agree on these amendments by the end of this year at the latest.
Finally, UNECE regulation 64 will have to be amended to include requirements on Tyre Pressure Monitoring Systems.

☐ Installation requirements

In some cases the existing separate Directive sets out installation requirements which are not reflected in the UNECE Regulation. In such cases (e.g. in the case of tyres), it will still be necessary to adopt EC implementing measures which would set out the installation requirements and would, as far as possible, refer to the technical and marking requirements set out in the corresponding UNECE Regulation(s). The alternative option would be to modify the UNECE Regulation(s) by the inclusion of installation requirements. While this is the option to be preferred in the long term, in the short term it might not be feasible to modify the UNECE Regulation(s) by the time the General Safety Regulation will have to be applied.

☐ Information folder

In some cases the existing separate Directives set out information requirements (information folder) which are not reflected in the UNECE Regulations. It should be assessed on a case by case basis whether these requirements are necessary and in which legal act they should be reproduced.

☐ Amendments to the UNECE Regulations

Annex IV of the General Safety Regulation listing the UNECE Regulations which have been made mandatory and Annex IV of the Framework Directive will have to be regularly updated to refer to the latest series of amendments to the UNECE Regulations.

The timetable for application of the new amendments will be generally decided at UNECE level. If there is a specific reason why a different timetable should be set at EC level, this latter timetable might be set out in the Commission's decision by which the EC approves the amendments to the UNECE Regulation.

☐ New technologies

Article 20 of Directive 2007/46/EC sets out a specific procedure for the approval of systems, components or separate technical units incorporating new technologies or new concepts. In the context of the 1958 UNECE Agreement, a similar procedure is set out in the document ECE/TRANS/WP.29/1059 on "Resolving interpretation issues and requirements for the technical services in the framework of the 1958 Agreement". It should be assessed whether this latter procedure can be considered as an appropriate substitute of the procedure set out in Directive 2007/46/EC for all the issues covered by the UNECE Regulations which will be made mandatory.

3. Issues not covered by UNECE Regulations

Concerning the issues not (entirely) covered by UNECE Regulations it is proposed to adopt implementing measures on each of the following subjects:

☐ Tyres (including installation requirements – for the technical specifications and test methods reference will be made to the relevant UNECE Regulations);

☐ Windscreen visibility systems (wash/wipe/defrost/demist);

☐ Spray protection systems (wheel guards/spray suppression);

☐ Masses and Dimensions (all vehicles);

☐ Plates (statutory plates, rear registration plate space)

☐ Towing hooks

☐ Gear Shift Indicators.

With the exception of the implementing measure on tyres, the above measures will essentially include the same requirements set out in the existing Directives. However, it will be explored whether it is possible to **simplify some of these existing requirements**.

4. System type-approval

While it would be possible to obtain **a type-approval covering all the issues falling under the scope of the General Safety Regulation** (hereinafter referred to as "General approval"), according to Article 4 of the Regulation manufacturers will still have the possibility **to type-approve a vehicle with respect to each of the different separate systems and the installation of each component or separate technical unit** (hereinafter referred to as "Partial approval") falling under the scope of the Regulation. In addition, as mentioned above, if manufacturers obtain a type-approval according to one of the UNECE Regulation listed in Annex IV of the General Safety Regulation, such an approval will be considered as an EC type-approval and there will be no need to comply with additional administrative procedures.

5. Amendments to Annex IV of the Framework Directive

Annex IV, part I, of the Framework Directive will have to be amended to include all the UNECE Regulations which will have been made mandatory.

During a transitory period when the General Safety Regulation will already apply but the existing Directives will not have been repealed yet, **Annex IV, part I**, will include references to both the repealed directives and the General Safety Regulation. When the Directives are repealed, the relevant entries in Annex IV, Part I will be deleted. Under the entry corresponding to the General Safety Regulation, different subentries will be included for each of the subjects covered by the General Safety Regulation. The regulatory act reference for these subentries will be either the UNECE Regulation or the specific implementing measure under the General Safety Regulation.

Annex IV, part II will also have to be amended by the deletion of the entries corresponding to the UNECE Regulations which will have been made mandatory.

6. EC type-approval certificate numbering system

For the items covered by the UNECE Regulations which will have been made mandatory, the fact that they are included in the scope of the General Safety Regulation will be irrelevant for the purpose of the type-approval procedure. Approvals under the UNECE Regulations will be enough and no additional administrative procedure under the General Safety Regulation will be required. **In addition, type-approvals concerning the issues covered by UNECE Regulation will use the appropriate numbering provided for in the respective UNECE Regulation.**

Concerning the issues not covered (or partially covered) by UNECE Regulations, the General Safety Regulation introduces another layer in the EC type-approval legal system.

Currently, in principle, there is only one separate act, under the Framework Directive, applying to a system, component or separate technical unit (i.e. the tyre directive for the tyres). With the proposed new system, two acts would apply to each system, component or separate technical unit falling under the scope of the General Safety Regulation, i.e. the General Safety Regulation and the specific implementing measure dealing with that system, component or separate technical unit.

Two questions might arise in this respect:

1. Is there a need to update the type-approval concerning systems, components or separate technical units falling under the scope of the General Safety Regulation each time an amendment is made to that Regulation?

2. What are the regulatory acts that should be referred to in sections 2 and 3 of the EC type-approval number?

In reply to the first question, it is understood that **a type-approval for a system, component or separate technical unit has to be updated only if and when the General Safety Regulation is amended with respect to the requirements concerning this specific system, component or separate technical unit.** The type-approval for the other systems, components or separate technical units which are not concerned by the amendment to the General Safety Regulation does not have to be updated. The whole vehicle type-approval (and the general vehicle type-approval concerning all the systems, components or separate technical units falling under the scope of the General Safety Regulation) will in any case have to be updated.

Concerning the second question, a distinction should be made between on the one hand the "General approval", on the other hand the "Partial approval".

With regard to the "General approval" concerning all the systems, components or separate technical units falling under the scope of the General Safety Regulation, the current system would continue to apply. This means that the General Safety Regulation will be mentioned under section 2 of the EC type-approval number and the number of the latest amending act to this regulation will be mentioned under section 3.

With regard to the "Partial approva"l of the vehicle with respect to a separate system or the type-approval of components and separate technical units, it is proposed that the measure to be mentioned under section 2 of the EC type-approval number would be the **specific implementing measure** under the General Safety Regulation concerning the specific system, component or separate technical unit and the measure to be mentioned under section 3 would be **the latest amendment of this measure**.

If this approach is accepted, then Annex VII of the Framework Directive would need to be amended to reflect the proposed change of the EC type-approval certificate numbering system.

7. Extension of approvals

Article 11 (9) of the General Safety Regulation foresees that vehicles, components and separate technical units, **for which the General Safety Regulation does not introduce new or modified requirements** (but simply carries over existing requirements) can continue to be sold, can enter into service and can be granted extension of approvals under the terms of the Directive under which they were originally granted.

In this regard, the replacement of directives with UNECE Regulations, in the case where the repealed directive had not been updated to reflect the latest version of the corresponding UNECE Regulation, has to be considered as a modification/addition of new requirements. Therefore, in these cases, extension of approvals under the repealed directive cannot be granted, nor the affected component or separate technical units can be sold or enter into service.

Annex I - Proposed List of UNECE Regulation to be made mandatory

Number (as given in Annex IV to 2007/46/EC)	Subject	Might be replaced by UNECE Regulation indicated below
3.	Fuel tanks	34
	LPG tanks	67
	CNG tanks	110
	Rear protective device	58
5.	Steering effort	79
6.	Door latches and hinges	11
7.	Audible warning	28
8.	Indirect vision devices	46
9.	Braking (M2, M3, N2, N3) including ESC	13
	Braking (M1,N1) including ESC	13H
	Replacement brake lining assemblies	90
10.	Radio interference (electro-magnetic compatibility)	10
12.	Interior fittings	21
13.	Anti-theft	18
	Anti-theft and immobiliser	116
	Vehicle Alarm Systems	97
14.	Behaviour of steering device under impact	12
15.	Seat strength	17
	Seat strength (buses and coaches)	80
16.	Exterior projections	26
17.	Speedometer	39
19.	Seat belt anchorages	14
20.	Installation of lighting and light signalling devices	48
21.	Retro reflectors	3
22.	End-outline/front-position (side)/rear-position (side)/stop lamps	7
	Daytime running lamps	87
	Side marker lamps	91
23.	Direction indicators	6
24.	Rear registration plate lamp	4
25.	Headlamps (R_2 and HS_1)	1
25.	Headlamps (sealed beam)	5

Number (as given in Annex IV to 2007/46/EC)	Subject	Might be replaced by UNECE Regulation indicated below
	Headlamps (H_1, H_2, H_3, HB_3, HB_4, H_7, and/or $H_{8,}$ H_9 ,HIR1, HIR2 and/or H_{11})	8
	Headlamps (H_4)	20
	Headlamps (halogen sealed beam)	31
	Filament lamps for use in approved lamp units	37
	Headlamps with gas-discharge light sources	98
	Gas-discharge light sources for use in approved gas-discharge lamp units	99
	Headlamps (asymmetrical passing beam)	112
	Adaptive front-lighting systems	123
26.	Front fog lamps	19
28.	Rear fog lamps	38
29.	Reversing lamps	23
30.	Parking lamps	77
31.	Seat belts and restraint systems	16
32.	Front forward field of vision	125
33.	Identification of controls, telltales and indicators	121
36.	Heating systems	122
38.	Head restraints (combined with seats)	17
	Head restraints	25
43.	Lateral protection	73
45.	Safety glazing	43
47.	Speed limitation devices	89
49	External projections of cabs	61[2]
50.	Couplings	55
	Close-coupling device	102
51.	Flammability	118
52.	Buses and coaches	107
	Strength of superstructure (buses and coaches)	66
53.	Frontal impact	94
54.	Side impact	95
56.	Vehicles intended for the transport of dangerous goods	105
57.	Front underrun protection	93

[2] Subject to the EU acceding to this Regulation

Barbara BONVISSUTO
Ian KNOWLES
6 March 2009

TAAM Minutes:

The TAAM delegates were requested to study the document and to send their remarks to the European Commission

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

6.1 78/2009/EC: Pedestrian Protection; Date of application and Monitoring, Germany 4

Issue:

The new Regulation 78/2009 is replacing the pedestrian protection directive 2003/102/EC and the frontal protection Directive 2005/66/EC. In the split level approach the Commission regulation describing the necessary provisions in an implementation regulation. The article of entry into force and application is not easy to read, so:
The KBA is asking, if the opinion that granting of an approval is only possible from the day of entry into force of the commission regulation on is right?

Second question is linked to the obligation for the TAA to send the monitoring results for upper leg tests and head-form impact to the windscreen. It would be very helpful if the commission offers a template (a kind of Excel format) for the monitoring.

Possible solutions:

Selection of solution			**accepted**	**refused**
1	**A**	Only from the day of the commission implementation Regulation is in force granting of an approval regarding EC-Reg. 78/2009 is possible. Not from now on	X	
	B	There is a restricted possibility to grant an approval from 24th of Nov 2009 on under the provision of the old directive		**X**
2		The Commission is providing a template for the monitoring, it maybe implemented in the commission implementation Regulation	**Will be helpful**	

Comment:

TAAM Minutes:

The TAAM delegates decided in favour of solution 1A.

Solution 2 could no longer be implemented by the European Commission because the text of the regulation had already been determined. The present request for a template was therefore being made too late.

6.2 70/220/EC: Reference mass for M1 and N1 category vehicles, United Kingdom 2

70/220/EEC as amended by 2003/76/EC: LIGHT VEHICLE EMISSIONS

REFERENCE MASS FOR M1 and N1 CATEGORY VEHICLES

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BACKGROUND

The definition for the reference mass used for vehicle emissions testing is linked to the mass in running order defined in the Framework Directive.

The Masses & Dimensions legislation for M1 vehicles (Directive 92/21/EC, as amended by 95/48/EC) defines the 'mass of the load in excess' as the difference between the 'technically permissible maximum laden mass' and the 'mass in running order' increased by the 'mass of the conventional load' (the conventional load being the mass of the passengers and their luggage).

The legislation also states that the 'mass of the load in excess' may include the mass of optional equipment, e.g. sunroof, air conditioning, coupling device.

This means that, in the case of M1 vehicles, the mass in running order does not need to include the mass of optional equipment.

This, in turn, means that the reference mass used for vehicle emissions testing also does not need to include the mass of optional equipment.

However, the Masses & Dimensions legislation for N1 vehicles (97/27/EC, as amended by 2003/19/EC) does not include the concept of a 'mass of the load in excess'. In the case of N category vehicles, the difference between the 'technically permissible maximum laden mass' and the 'mass in running order' increased by the mass of the passengers is simply the 'payload'.

ISSUE

A strict interpretation of the legislation means that, in the case of a vehicle that is approved for both M1 and N1 categories, the reference masses could be different (M1 without options and N1 with options) and hence it might be necessary to conduct two separate emissions test - even though, in respect of the emissions performance, the vehicles specifications could be essentially the same.

Possibilities of solution			Comments
	A	When the reference mass for the M1 derivative of a vehicle does not include options it is acceptable to use the same reference mass for emissions approval of the corresponding N1 derivative	Only valid if, in respect of emissions performance, the M1 and N1 specifications are essentially the same.
	B	When the reference mass for the M1 derivative of a vehicle does not include options there must be different reference masses for the M1 and N1 specifications.	There is no concept of 'mass of the load in excess' for N1 vehicles and hence the mass of the options must be included in the reference mass used for emissions tests of the N1 specification

LEGISLATION

EC Directive 70/220/EEC as amended by 2003/76/EC (Emissions)

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*

2.2. "REFERENCE MASS"

means the **mass of the vehicle in running order less the uniform mass of the driver of 75 kg and increased by a uniform mass of 100 kg.**

2.2.1. "Mass of the vehicle in running order" means the mass defined in section 2.6 of Annex I to Directive 70/156/EEC.

EC Directive 92/21/EC as amended by 95/48/EC (Masses & Dimensions for M1vehicles)

ANNEX II - SCOPE, DEFINITIONS, REQUIREMENTS

1. Scope

This Directive applies to the masses and dimensions of motor vehicles in category M_1 as de fined in Article 1.

2. Definitions

*2.1. The pertinent **definitions as laid down in Annex I (including the footnotes) and in Annex II to Directive 70/156/EEC apply also to this Directive.***

2.2. 'Mass of the conventional load' means a mass of 75 kg multiplied by the number of passen ger seating positions (including folding (tip-up) seats) designated by the manufacturer.

*2.3. 'Mass of the load in excess' means the difference between the technically permissible maxi mum laden mass and the **mass in running order** increased by the mass of the conventional load. **The mass of the load in excess may include the mass of optional equipment, e.g. sunroof, air conditioning, coupling device.***

EC Directive 97/27/EC as amended by 2003/19/EC (Masses & Dimensions for vehicles other than M1)
ANNEX 1

7.4.2.4. The mass in running order, plus the mass corresponding to 75 kg multiplied by the number of passengers, plus the technically permissible maximum mass on the coupling point, must not exceed the mass M.

7.4.2.5.1. Uniform distribution of mass means the vehicle in running order with a mass of 75 kg positioned on every passenger seat is laden to its mass M, the payload being uni formly distributed on the area designed for the transportation of goods[2003_19-16].

TAAM Minutes:

The TAAM delegates decided in favour of solution B.

6.3 2006/40/EC: Information about mobile air-conditioners (MAC-Directive), European Commission 3

2. Information about Mobile Air Conditioners (MACs)
3.

Document will be provided soon!

TAAM Minutes:

No document was being issued on 6.3 by the European Commission.

The subject was being dealt with in connection with item 6.4 (Germany 6).

6.4 2006/40/EC: Emissions from air-conditioning systems in motor vehicles, Germany 6

Directive 2006/40/EC (MAC-Directive) and EC-Regulation No 706/2007
Emissions from air-conditioning systems in motor vehicles¨

Issue

According to 2006/40/EC Art. 5(4) no type-approvals shall be granted for a type of vehicle fitted with an air conditioning system designed to contain fluorinated greenhouse gases with a GWP higher than 150 with effect from 1 January 2011.

With effect from 1 January 2017 the CoC of such a new vehicle shall be considered as invalid, registration shall be refused and sale and entry into service shall be prohibited.

According to Art. 3 (2) of 2006/40/EC a vehicle type means a type defined in section B of Annex II of 70/156/EEC.

According to Art. 2 (1) of Commission Regulation No 706/2007 a vehicle type with regard to emissions from air-conditioning systems means a group of vehicles which do not differ as regards the refrigerant used or other main characteristics of the air-conditioning system or as regards the evaporator system, whether single or dual.

Due to this conflicting type definitions it is not always clear, if a new vehicle (WVTA 0002) using the identical air-conditioning system of the older vehicle (WVTA 0001) is a new type in the sense of this legal act.

Question:

Is it possible to grant a new whole vehicle type-approval (WVTA) after 1 January 2011 for a vehicle type 0002 using an air-conditioning system which is of the approved system-type according to EC-Reg 706/2007 for an already approved vehicle type 0001?

Possibilities of solution			Comments
	A	**Yes**, a new WVTA can be granted up to the 31 December 2016. The existing MAC-system-approval must be extended by the new vehicle type 0002. System-approvals stay valid for a new vehicle type, when the system type criteria are not exceeded.	The vehicle type is already approved by the system approval, because the system approval is always an approval for the vehicle regarding the provisions for its system (here the air conditioning).
	B	**Yes,** a new WVTA can be granted up to the 31 December 2016, when the vehicle type 0002 is already contained in the MAC-system-approval before 1 January 2011. An later extension of the MAC-system-approval by a new vehicle type is not possible due to the type criteria laid down in Art. 3 (2) of 2006/40/EC. System type criteria acc. to 706/2007 are not exceeded, but the system type criteria laid down in 2006/40/EC would be violated.	The vehicle type is already approved by the system approval, because the system approval is always an approval for the vehicle regarding the provisions for its system (here the air conditioning), but the vehicle type has to be approved before the transitional date ends regarding his system.
	C	**Other interpretation**	

Type approving authority "e"			
Selection of solution		accepted	refused
	A		
	B		
	C		

TAAM Minutes:

No decision was possible because the discussions showed that the definition of the "new vehicle type" was unclear.

This matter was to be clarified by the Legal Service of the European Commission.

6.5 72/245/EC: EMC, Sweden 3

SUBJECT: **EMC**
DIRECTIVE: **72/245/EEC, amended by 2004/104/EC**

RELEVANT SECTIONS:

Article 2
4. As from 1 January 2009, the provisions laid down in Annexes I to X to Directive 72/245/EEC, as amended by this Directive, relating to electromagnetic compatibility, shall apply to components or separate technical units for the purposes of Article 7(2) of Directive 70/156/EEC.

QUESTION / PROBLEM /CONCERN:
Is it allowed to sell replacement parts (components or separate technical units) that are type approved according to 72/245/EEC amended by 95/54/EC, intended for use on vehicle types which have been approved before 1 July 2006 pursuant to Directive 72/245/EEC amended by 95/54/EC?

	A	Yes, replacement parts can still be sold	
	B	No	

Type approving authority "e"	5

Selection of solution		
	A	
	B	

TAAM Minutes:

No decision could be taken owing to different opinions. The matter had to be considered on a case-by-case basis.

The TAAM delegates were requested to send their opinions to Sweden

The point would be taken up again at the next TAAM meeting.

6.6 ECE R11.03: Door latches and door retention components, Netherlands 6

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-006

v1.00 – 10 March 2008

Directive or Regulation number:
ECE R11.03
Subject:
Door latches and door retention components

Reference to Annex, etc in the Directive or Regulation:
Scope, Paragraph 2.5 and 5.1

Text:
In the scope of this Regulation is mentioned: *"This Regulation applies to vehicles of categories M1 and N1 1/ with respect to latches and door retention components such as hinges and other supporting means on doors,* ***which can be used for the entry or exit of the occupants"*** In paragraph 2.5 is a definition given of back door: "*is a door or door system on the back end of a motor vehicle through which* ***passengers can enter or depart the vehicle or cargo can be loaded or unloaded****.* *It does not include:* *(a) a trunk lid; or* *(b) a door or window composed entirely of glazing material and whose latches and/or hinge systems are attached directly to the glazing material*." In paragraph 5.1. is stated: "*The requirements apply to all side and* ***back doors*** *and…*"

Question:
According to the scope, only doors which can be used for the entry or exit of the occupants are covered by this Regulation, but in the rest of the document also requirements are mentioned for back doors (i.e. as fitted to hatchback type vehicles). Should back doors, as defined in paragraph 2.5, on vehicles that are only used for loading and unloading of cargo be tested?

Solution:		
A	Yes, the scope does not exclude back doors from the requirements	
B	No, the scope of this Regulation clearly states that only doors used for entry or exit of occupants must be tested	

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

Authority:	
Type approval Authority e/E	**4**

Remarks:

TAAM Minutes:

No decision could be taken since the text of regulation ECE R11.03 was unclear.
The text of the regulation had to be adapted. The Netherlands would raise this matter at the GRSP.
Until the regulation was adapted, solution A would apply.

6.7 ECE R21.01: Sun visors in relation with Annex 8, Netherlands 5

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-005

v1.00 – 10 March 2008

Directive or Regulation number:
ECE R21.01
Subject:
Sun visors in relation with Annex 8

Reference to Annex, etc in the Directive or Regulation:
Annex 4 & 8 Paragraph 5.1.1, 5.1.7, 5.3.4, 5.9.2 general requirements; Annex 4 paragraph 1.4.1.1

Text:

Requirements

5.1.1. The reference zone defined in paragraph 2.3. above shall not contain any dangerous roughness or sharp edges likely to increase the risk of serious injury to the occupants. If the head impact area is determined according to annex 1, the parts referred to in paragraphs 5.1.2. to 5.1.6. below shall be deemed satisfactory if they comply with the requirements of those paragraphs. If the head impact area is determined according to annex 8,the requirements of paragraph 5.1.7. shall apply (see annex 10, explanatory notes, paragraph 5.1.1.).

5.1.7.1. If the protective system of the vehicle type cannot prevent head contacts of the occupants defined in paragraph 1.2.1. of annex 8 with the instrument panel, and a dynamic reference zone according to annex 8 is determined, the requirements of paragraphs 5.1.2. to 5.1.6. are applicable only to the parts located in that zone.
Parts in other areas of the dashboard above the level of the instrument panel, if contractable by a 165 mm diameter sphere, shall be at least blunted.

5.1.7.2. If the protective system of the vehicle type is able to prevent head contacts of the occupants defined in paragraph 1.2.1. of annex 8 with the instrument panel and therefore no reference zone can be determined, the requirements of paragraphs 5.1.2. to 5.1.6. are not applicable to this vehicle type.
Parts of the dashboard above the level of the instrument panel, if contractable by a 165 mm diameter sphere, shall be at least blunted.

5.3.4.1. Components mounted on the roof but which are not part of the roof structure, such as grab handles, lights and sun visors, etc. shall have a radius of curvature not less than 3.2 mm. In addition, the width of the projecting parts shall not be less than the amount of their downward projection; alternatively, these projecting parts shall pass the energy-dissipating test in accordance with the requirements of annex 4[01 Cor 1-13]. (see annex 10, explanatory notes, paragraph 5.3.4.1.)

5.9.2. For parts like a centre console, for example, or other components of the vehicle which belong to 5.9.1., it is not necessary to perform an energy dissipation test according to annex 4 to any component contractable by the device and procedure specified in annex 1 if in the opinion of the Technical Service the occupant's head is unlikely to contact the component, because of the restraint system(s) installed in the vehicle, or,
because the manufacturer can prove the lack of such contact using, for example, the method described in annex 8, or any equivalent method

Annex 4

1.4.1.1. For testing the parts, as referred to in paragraphs 5.3.4.1. and 5.4.2.2. of this Regulation, the area of the measuring apparatus shall be lengthened until contact is made with the part to be considered, up to a limit of 1,000 mm between the pivot point and the top of the head of the apparatus

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-005

Question:
Annex 8 was mainly developed to introduce an alternative head impact zone for the instrument panel. Paragraph 5.9.1. however, also allows the dynamic method to be used for other parts e.g. a centre console. Is this method also allowed to be used for components mounted on the roof e.g. sun visors ?

Solution:		
A	Yes, if it can be demonstrated that, using Annex 8, no contact appears with components mounted on the roof in any position of use, it is not necessary to perform an energy dissipation test according to annex 4 on these components	
B	No, Annex 4 states that for parts mounted on the roof, the pendulum has to be extended up to 1000 mm; Annex 8 is an alternative for the head impact zone of parts that can be contacted by a pendulum between 736 and 840 mm	

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

Authority:	
Type approval Authority e/E	**4**

Remarks:

TAAM Minutes:

The TAAM delegates decided in favour of solution B.

6.8 89/297/EEC: Central axle trailer and side guards, Germany 3

Germany 3

Directive 89/297/EEC
Central axle trailer and side guards

Issue

Section 2.4 of Annex I to Directive 89/297/EEC describes how side guards shall be constructed. However it is not mentioned directly how this requirement shall be assigned to central axle trailers. Concrete provisions are only mentioned for motor vehicles, drawbar trailers and semi-trailers.

This topic was brought forward by the RDW (Edinburgh Question: Netherlands 5.) in preparation to the October 2008 meeting. During the discussions in Edinburgh Germany supported with some slight modification the solution B as proposed by RDW.

Question:

Are the requirements stated in Directive 89/297/EEG clear enough to grand type approvals for central axle trailers or should this Directive be rephrased more clearly making direct reference to central axle trailers (category O3 – O4)?

Prescription

Directive 89/297/EEC

Possibilities of solution			Comments
	A	**Yes**, it is recommended to have clearly phrased requirements regarding to central axle trailers (category O3 – O4) in the Directive.	In Germany there is an ongoing discussion on this topic.
	B	**No**, Directive 89/297/EEG is clear enough for granting of type-approvals for central axle trailers (category O3 – O4).	

Type approving authority "e"	1

Selection of solution		accepted	refused
	A	X	
	B		X

TAAM Minutes:

France informed the meeting that it would be requesting an amendment of Regulation ECE R73 at the GRSG.

The TAAM delegates decided in favour of solution A, until the Regulation was changed.

6.9 92/22/EEC: Safety glazing and glazing materials, Latvia 1

Miscellaneous (Directive 92/22/EEC and ECE Regulation No.43) / Latvia
Safety glazing and glazing materials

Problem

Accordant to ECE Regulation No. 43 Annex 21 paragraph 4.2.1.1. - The safety glazing through which the driver's forwards field of vision as defined in paragraph 2.18.1. of this Regulation is obtained, must have a regular light transmittance of at least 70 per cent.

There are many cases detected at pre-registration inspection that buses and coaches registered previously in EU Member States (for example, Italy, Germany etc.) have front side windows (left from driver) and front right side door glazing marked with the symbol "V" which means light transmittance of less than 70 per cent (paragraph 5.5.2. of ECE No.43). These glazings are situated (located) in driver's forward field of vision.

Question: We are looking for the opinoin of the Member States regarding the above mentioned problem. Are there national derogations allowed to use glazing marked with the symbol "V" situated (located) in driver's forwards field of vision for M3 category vehicles?

Definition of ECE Regulation No. 43:

2.18.1. "Safety glazing material requisite for driver's forwards field of vision" means all the glazing situated in front of a pane passing through the driver's R point and perpendicular to the longitudinal median plane of the vehicle through which the driver can view the road when driving or manoeuvring the vehicle.

Possibilities of solution			Comments
	A	Glazing materials marked with symbol "V" are not allowed for the driver's forwards field of vision	
	B	Glazing materials marked with symbol "V" are allowed for front side windows of the driver's forwards field of vision for M3 category vehicles, if yes – are there any additional special requirements existing (for example – installation parameters of the rear view mirrors etc.)	

Type approving authority "e"	**32**

Selection of solution		accepted	refused
	A	X	
	B		X

Other opinion / comment:

TAAM Minutes:

No uniform solution was possible owing to different national regulations.

The TAAM delegates were requested to send their national regulations and details of their approach in practice to Latvia

6.10 2005/55/EC: Emission of heavy duty vehicles, France 3

Emission of heavy duty vehicles

- **Regulation number :**

- Directive 2005/55/EC last amended 2008/74/EC on the approximation of the laws of the Member States relating to the measures to be taken against the emission of gaseous and particulate pollutants from compression-ignition engines for use in vehicles, and the emission of gaseous pollutants from positive-ignition engines fuelled with natural gas or liquefied petroleum gas for use in vehicles.
- Regulation CE/715/2007 last amended CE/692/2008 on type approval of motor vehicles with respect to emissions from light passenger and commercial vehicles (Euro 5 and Euro 6) and on access to vehicle repair and maintenance information.
- Directive 72/306/EEC last amended 2005/21/EC on the approximation of the laws of the Member States relating to the measures to be taken against the emission of pollutants from diesel engines for use in vehicles

- **Text of Directive 2008/74/EC**

(3)
In addition, it is necessary to introduce existing requirements for measuring the smoke opacity of diesel engines into Directive 2005/78/EC. This is due to the repeal of Council Directive 72/306/EEC of 2 August 1972 on the approximation of the laws of the Member States relating to the measures to be taken against the emission of pollutants from diesel engines for use in vehicles (4) as provided by Regulation (EC) No 715/2007.

Article 3

1. Member States shall adopt and publish, by 2 January 2009 at the latest, the laws, regulations and administrative provisions necessary to comply with this Directive. They shall forthwith communicate to the Commission the text of those provisions and a correlation table between those provisions and this Directive.

They shall apply those provisions from 3 January 2009.

- **Text of Regulation EC/715/2007**

Article 17

Repeal
1. The following Directives shall be repealed with effect from 2 January 2013:
— Directive 72/306/EEC,

- **Issue**

Annex II of Directive 2008/74/EC introduce provision for the measurement of smoke opacity on the third of January 2009. Directive 72/306/EC is repealed on the second of January 2013.
Does a type-approval (for a system or a vehicle) with regard to 2005/55/EC amended 2006/51/EC remains valid after the third of January 2009 and until 72/306/EEC is repealed?

Possibilities of solution			Comments
	A	Yes, existing approvals with regard to 2005/55/EC amended 2006/51/EC remains valid after the third of January. It must be completed with a 72/306/EC approval.	It means that 2008/74/EC implementation dates are: - the 3rd January 2009 for a new type - the 2nd January 2013 for an existing type
	B	No, a new approval with regard to 2005/55/EC amended 2008/74/EC must be granted.	There is only one implementation date which is 3rd January 2009.

Type approving authority « e »	2

Selection of solutions		Accepted	Refused
	A	X	
	B		X

TAAM Minutes:

The TAAM delegates decided in favour of solution A.

6.11 2001/85/EC: Device for emergency in buses, France 4

Device for opening emergency in buses

- **Regulation number :**

– Directive 2001/85/EC 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 seat, and amending Directives 70/156/EEC and 97/27/EC

- **Text of Directive 2001/85/EC**

7.6.5.1. In the event of an emergency, every power-operated service door shall be capable, when the vehicle is stationary (but not necessarily when the vehicle is moving), of being opened from inside and, when not locked, from outside by controls which, whether or not the power supply is operating :
[…]
7.6.5.1.7. in the case of a driver-operated door which does not comply with the requirements of paragraph 7.6.5.6.2, it shall be such that after the controls have been operated to open the door and returned to their normal position, the door will not close again until the driver subsequently operates a closing control.

7.6.5.6. The construction and control system of every power-operated service door shall be such that a passenger is unlikely to be injured by the door or trapped in the door as it closes.
7.6.5.6.1. This requirement shall be considered satisfied if the following two requirements are met.
7.6.5.6.1.1. The first requirement is that when the closing of the door at any measuring point described in Annex V is resisted by a clamping force not exceeding 150 N, the door shall reopen automatically to its fullest extent and, except in the case of an automatically operated service door, remain open until a closing control is operated. The clamping force may be measured by any method to the satisfaction of the competent authority. Guidelines are given in Annex V to this Directive. The peak force may be higher than 150 N for a short time provided that it does not exceed 300 N. The reopening system may be checked by means of a test bar having a section of height 60 mm, width 30 mm with corners radiused to 5 mm
7.6.5.6.1.2. The second requirement is that whenever the doors are closed onto the wrist or fingers of a passenger:

7.6.5.6.2. In the case of a front service door the requirement of paragraph 7.6.5.6 shall be considered satisfied if the door :
7.6.5.6.2.1. fulfils the requirements of paragraphs 7.6.5.6.1.1 and 7.6.5.6.1.2,
or
7.6.5.6.2.2. is fitted with soft edges; these shall not, however be so soft that if the doors are closed on the test bar mentioned in paragraph 7.6.5.6.1.1 the rigid structure of the doors will reach the fully closed position

- **Issue**

Paragraph 7.6.5.1.7 states that the device for opening emergency « in the case of a driver-operated door which does not comply with the requirements of paragraph 7.6.5.6.2, it shall be such that after the controls have been operated to open the door and returned to their normal position, the door will not close again until the driver subsequently operates a closing control.»

Paragraph 7.6.5.6.2 only applies to front doors. A door, other than a front door, always meets the requirements of paragraph 7.6.5.6.2 to the extent that it must be consistent with the paragraph 7.6.5.6.1, and hence the paragraph 7.6.5.6.1.1 and 7.6.5.6.1.2.

Can be considered as conforming to the paragraph 7.6.5.1.7, a rear door which closes when the return to normal position of the emergency device, if it meets the paragraph 7.6.5.6.2 ?

Possibilities of solution			**Comments**
	A	Yes,	
	B	No, the device for opening emergency of door but not a front door, shall be such that after the controls have been operated to open the door and returned to their normal position, the door will not close again until the driver subsequently operates a closing control.	*Paragraph 7.6.5.1.7*

Type approving authority « e »	2

Selection of solutions		Accepted	Refused
	A		X
	B	X	

TAAM Minutes:

The TAAM delegates decided provisionally in favour of solution B.

The point was to be raised at the GRSG, however.

6.12 2001/85/EC: Communication devices in buses, France 5

Communication devices in buses

- **Regulation number:**

– Directive 2001/85/EC 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 seat, and amending Directives 70/156/EEC and 97/27/EC (Annex I and VII)

- **Text of Directive 2001/85/EC**

Annex I
7.7.9.1. On vehicles of Class I, II and A, a means shall be provided to enable passengers to signal to the driver that she/he should stop the vehicle. The controls for all such communication devices shall have protruding buttons, in vehicles of Class I and A no more than 1 200 mm from the floor, and shall be a contrasting colour or colours. Controls shall be distributed adequately and evenly throughout the vehicle. Activation of the control shall also be indicated to the passengers by means of one or more illuminated signs. […] and/or a suitable pictogram and shall remain illuminated until the service door(s) open. […]

Annex VII

3.3. Communication devices
3.3.1. Communication devices shall be placed adjacent to any priority seat and within any wheelchair area and shall be at a height between 700 mm and 1 200 mm above the floor.
3.3.2. Communication devices situated in the low-floor area shall be at a height between 800 mm and 1 500 mm where there are no seats.
3.3.3. The control for all internal communication devices shall be capable of operation with the palm of the hand and shall be in a contrasting colour or colours and tone.
3.3.4. If a vehicle is fitted with a ramp or lift, a means of communication with the driver shall be fitted outside, adjacent to the door, and not higher than 1 300 mm from the ground.

- **Issue**

Paragraph 7.7.9.1 of Annex I provides requirements for communication devices.

All devices required by the Directive 2001/85/EC, including those imposed by Annex VII at the places for wheelchair and/or space for passengers with reduced mobility, and especially in vehicles of Class III (paragraph 3.1.1 of Annex VII) have to meet all the requirements of paragraph 7.7.9.1 ?
(example : presence of a warning "stop requested" visible to passengers)

Possibilities of solution			**Comments**
	A	Yes, communication devices in the vehicle of Class III and B meet the requirements of paragraph 7.7.9.1	
	B	No	

Type approving authority « e »	2

Selection of solutions		Accepted	Refused
	A	X	
	B		X

TAAM Minutes:

Directive 2001/85/EC, Article 3 (2) states:

Member States shall be free to choose the most appropriate solution to achieve improved accessibility in vehicles other than those of Class I. However, if vehicles other than those of Class I are equipped with devices for people with reduced mobility and/or wheelchair users, they shall comply with the relevant requirements of Annex VII.

The TAAM delegates decided in favour of solution A.

6.13 2005/66/EC: Front grill in an engine hood, Luxembourg 1

TAAM QUESTION 1, from Luxembourg for TAAM 2009-03-26--27

SUBJECT
Detailed technical requirements for carrying out the tests specified in Directive **2005/66/EC** of the European Parliament and of the Council relating to the use of frontal protection systems on motor vehicles.

QUESTION / PROBLEM / CONCERN:

Can a front grill in an engine hood be approved under Directive 2005/66/EC?

Explanation:
Such devices are mainly sold for optical tuning, very often in combination with front bull bars and can be easily considered as a part of a frontal protection system. However, the device will replace an existing grille and as such is not complementary but replacement.
Such a front gill is not explicitly named in the directive. However, in order to make sure that such a device does not deteriorate the pedestrian safety in case of an impact, the only logical test where they can be submitted would be testing according to directive 2005/66/EC.

Possible solutions:

1A	It is possible to grant an homologation for a front Bull-bar with an front grille	
1B	It is not possible to grant an homologation for a front Bull-bar with an front grille.	
2	Luxembourg would like to know the opinion of the other member states on this and how it is handled in your country	

Photo / drawing of Bull Bar Grill:

TAAM Minutes:

The TAAM delegates decided in favour of solution 1A.

7. ITEMS RELATING TO FRAMEWORK DIRECTIVE 2002/24/EC (MOTOR CYCLES)

7.1 2002/24/EC: Dates in CoC - Document, Sweden 4

TAAM QUESTION 4, from Sweden for TAAM 2009-03-26 -- 27

SUBJECT: **Dates in COC-document**

DIRECTIVE: **2002/24/EC**

RELEVANT SECTIONS: Annex IV, Certificates of conformity
Certificates of conformity
A. CERTIFICATE OF CONFORMITY ACCOMPANYING EACH VEHICLE IN THE SERIES OF THE TYPE WHICH HAS BEEN APPROVED

QUESTION / PROBLEM /CONCERN:
The Swedish authority has received a COC-document from a manufacturer in which the date when the document is issued precedes the type approval date; the type approval in this case is an extension. We consider this COC-document as not valid since a COC is to be issued for a type which has been approved. The manufacturer claims that issuing a COC for a vehicle before it is type approved is commonly used within the EC.
We would like to get an opinion from the other member states – would you consider this COC-document valid or not?

	A	Yes, the COC-document is valid	
	B	No, the COC-document is not valid	

Type approving authority "e"	5

Selection of solution		
	A	
	B	X

TAAM Minutes:

The TAAM delegates decided in favour of solution B.

7.2 97/24/9/EC: Electronically adjustable exhaust valves - electronic sound management, Switzerland 1

TAAM, Bern, Switzerland (March 26 and 27, 2009) **Switzerland 1**

SUBJECT: Electronically adjustable exhaust valves - electronic sound management

DIRECTIVE: 97/24/EC, chapter 9 and 7 as well as 70/157/EEC

Background

Recently more and more exhaust systems with electronic sound management have been put on the market. On the one hand, these systems are often part of an EC whole vehicle type-approval; on the other hand they are sold as non-original replacement silencers with an EC component type-approval. The electronic sound management of these systems automatically closes or opens an exhaust valve as a function of the speed of the vehicle. The valves are closed at the speed of the noise measurement test procedure of the corresponding EC-directive and opened at most of the other speed ranges. When the valves are open, the vehicle produces considerably more noise.

Furthermore, non-original silencers that can easily be manipulated are also provided with EC component type-approvals. These systems are easily adjustable, be it mechanically or electromechanically (by pressing a button) and fit the applicable noise measurement prescriptions only in the position with the closed exhaust valve.

In our opinion the aim of the prescriptions about the permissible sound level is, that vehicles neither strike in a disturbing manner by there noise level nor are annoying. It is true that the assessment prescriptions only cover very specific operating conditions. However, this has to be seen on a historical background. At the time when the measuring methods were developed and determined, systems that selectively reduce and restore silencing as a function of the operating conditions were not known. According to the sense and the aim of the prescriptions it seems to be obvious that the silencing must be effective over the whole operating range of the vehicle. Just for illustration one can imagine an extreme case of an automatic and selective variable exhaust system, that completely inactivates silencing outside of the measuring conditions but activates it within the measuring conditions. This system would produce an enormous noise yet comply with the wording of the applicable EC-directive. Can such a system be legal?

Major Concern

Though complying with the wording of the applicable EC-directives, the electronic sound management systems often serve to the evasion of the sense of the prescriptions. More noise than needed is produced when the silencer isn't equally active over the whole speed range of the vehicle.

As far as the easily adjustable exhaust systems are concerned, they make an abuse very simple. The risk of the vehicle being run under road traffic conditions in the illegal, noisy manner is high.

Questions

1. Are you of the opinion that automatically variable silencers (or easily adjustable silencers) that would not pass the noise measurement of the applicable EC-directive with open exhaust valves - i. e. in most parts of the actual operating conditions - do comply with the sense and the aim of the prescriptions:

Answer:

A) Yes;

B) No.

2. Should type-approvals be issued for the exhaust systems in question:

Answer:

A) Yes;

B) No.

3. Do you consent to a gentleman's agreement that makes sure that no further type approvals are issued for the exhaust systems in question:

Answer:

A) Yes;

B) No.

4. In case you have affirmed question 3, how do you think it should be proceeded with the already issued type approvals for the exhaust systems in question? Would you:

Answer:

A) cancel the already existing type approvals;

B) renounce to cancel the already existing type approvals but ensure that no new type approvals are being issued.

5. Do you support a request for a complement of the relevant prescriptions (97/24/EC as well as 70/157/EEC resp. ECE-R 41 and ECE-R 51) so that the exhaust systems in question will explicitly be forbidden?

Answer:

A) Yes;

B) No.

Comments

Authority

TAA code: **„e"** **„E"**

TAAM Minutes:

Questions 1., 2. and 4. depended on questions 3. and 5. Therefore only questions 3. and 5. would be discussed.

The TAAM delegates decided in favour of solutions 3B and 5A.

With regard to 5A, working groups were already active within the GRB. It was expedient to wait for the outcome of the work of these working groups.

7.3 2002/24/EC: Pedelecs with auxiliary electric motor with more than 0,25 kW rated power, Germany 2

KBA

Germany 2: **Pedelecs with auxiliary electric motor with more than 0,25kW rated power**

Issue:

In Germany there are more and more manufacturers of bicycles with auxiliary electric motor with more than 0,25 kW (up to 0,5 kW) continuous rated power. Refer to article 1, number 1 (h) of 2002/24/EC:

“cycles with pedal assistance which are equipped with an auxiliary electric motor having a maximum continuous rated power of 0,25 kW, of which the output is progressively reduced and finally cut off as the vehicle reaches a speed of 25 km/h, or sooner, if the cyclist stops pedalling”

Are these vehicles within the scope of 2002/24/EC (L1e)?

Possible solutions:

Type approving authority "e"	**1**

Selection of solution		**accepted**	**refused**
A	Yes, these vehicles are within the scope of 2002/24/EC. Type-approval is mandatory	**X**	
B	No, these vehicles are equate with cycles with auxiliary motor up to 0,25 kW and national law like for bicycles shall apply. The scope of 2002/24/EC has to be corrected to get these vehicles out of the scope.		**X**

Comment:

TAAM Minutes:

The TAAM delegates decided in favour of solution A.

8. ITEMS RELATING TO RECAST FRAMEWORK DIRECTIVE 2003/37/EC (AGRICULTURAL AND FORESTRY VEHICLES)

8.1 2003/37/EC: Tractor/Skidder, Slovakia 1

Ministry of Transport, Posts and Telecommunications of the Slovak Republic

STATE TRANSPORT OFFICE – Type Approval Authority e27 / E27

Directive or Regulation number:
2003/37/EC
Subject:
- Tractor/skidder
Text:

Aforementioned vehicle corresponds to the definition of the wheeled tractor of category T according the directive 2003/37/EC.

Pursuant to the Article 1 Section 2 Letter b) of the directive 2003/37/EC, directive does not apply to machinery that has been specially designed for forestry use, such as skidders and forwarders as defined in standard ISO 6814:2000.

At the first sight there is a skidder at the picture, but it is able to pull trailers of category R towed by tractor or Interchangeable machinery of category S towed by the tractor, so the vehicle does not correspond to skidder definition pursuant to ISO 6814:2000 anymore, but the wheeled tractor definition pursuant to directive 2003/37/EC.

Question:
1. Should this vehicle be approved as wheeled tractor of category T and should the WVTA be granted according to the directive 2003/37/EC or should this vehicle be approved as mobile working machinery (definition pursuant to Article 3 point 16 of the framework directive 2007/46/EC)?
Possibilities of solution:

1.	**A**	Abovementioned vehicle is not a skidder pursuant to the ISO 6814:2000 and should be approved as the wheeled tractor of category T pursuant to the directive 2003/37/EC.	
	B	Abovementioned vehicle is a skidder pursuant to the ISO 6814:2000 so it is not allowed to approved it as the wheeled tractor pursuant to the directive 2003/37/EC.	
Decision (accepted):			
e27	**A**		
Legislation:			

Tractor definition according to the Article 2 Letter j) of the directive 2003/37/EC:

„Tractor“ means any motorised, wheeled or tracked agricultural or forestry tractor having at least two axles and a maximum design speed of not less than 6 km/h, the main function of which lies in its tractive power and which has been especially designed to pull, push, carry and actuate certain interchangeable equipment designed to perform agricultural or forestry work, or to tow agricultural or forestry trailers; it may be adapted to carry a load in the context of agricultural or forestry work and/or may be equipped with passenger seats.

Skidder definition according to the point 2.3.1.11 of the ISO 6814:2000:

2.3.1.11 „Skidder“ is mobile working machinery constructed for tree trunk / tree trunk parts transportation by towing or pulling.

Mobile machinery definition according to the Article 3 point 16 of the directive 2007/46/EC:

„Mobile machinery“ means any self-propelled vehicle which is designed and constructed specifically to perform work which, because of its construction characteristics, is not suitable for carrying passengers or for transporting goods. Machinery mounted on a motor vehicle chassis shall not be considered as mobile machinery.

TAAM Minutes:

The TAAM delegates decided in favour of solution A.

8.2 2003/37/EC: Mechanical Couplings for Tractors, Germany 1

KBA

Germany 1: **Directive 89/173/EEC Annex IV, Mechanical Couplings for Tractors**

Issue:

Appendix 4 of Annex IV of directive 89/173/EEC recommends that the height of the letters for the component type-approval mark has to be at least 10 mm. Directive 94/20/EC, 97/24/EC Chapter 10 and ECE-R 55 recommend a letter height of approximately 3 mm. Some manufacturers of coupling devices do have problems with the dimensions of the type-approval mark. Is there a special need for the bigger dimensions of the approval mark for mechanical couplings for tractors?

Possible solutions:

Type approval authority "e"	**1**

Selection of solution		**accepted**	**refused**
A	There is no special need for the bigger dimensions of the approval mark for mechanical couplings for tractors. Approval mark according to 94/20/EC would be adequate. 89/173/EEC should be amended.	**X**	
B	There is a special need for the bigger dimensions of the approval mark for mechanical couplings for tractors.		**X**

Comment:

TAAM Minutes:

The TAAM delegates decided in favour of solution A.

Directive 89/173/EEC had to be adapted to it. Until the Directive had been adapted, the height of the approval marks had to be 10 mm.

8.3 2000/25/EC: Flexibility scheme for tractor vehicles, France 2

Flexibility scheme for tractor vehicles

- **Regulation number :**

Directive 2000/25/EC last amended 2005/13/EC concerning the emission of gaseous and particulate pollutants by engines intended to power agricultural or forestry tractors

- **Text of Directive 2000/25/EC amended 2005/13/EC**

Article 3a

Flexibility Scheme

By way of derogation from Article 3(1) and (2), Member States shall provide that, at the request of the tractor manufacturer, and subject to permission being granted by the approval authority, the engine manufacturer may, during the period between two successive limit value stages, place on the market a limited number of engine that comply only with the emission limit value stage immediately preceding the currently applicable stage, or tractors with such engines, provided that he complies with the procedure set out in Annex IV.

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 emission 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.

- **Issue**

Today, tractors emission must comply with stage IIIA and so a flexibility scheme for stage II vehicle can be delivered until the beginning of stage IIIB.
During stage IIIB, a flexibility scheme for stage IIIA tractor can be delivered.
As there is no further stage after stage IV, is it possible to deliver a flexibility scheme for stage IIIB tractor during stage IV?

	Possibilities of solution		**Comments**
	A	No, a flexibility scheme can only be delivered between two emission stage.	
	B	Yes, it is permitted to deliver a flexibility scheme for stage IIIB vehicle during stage IV.	The flexibility scheme will have no end date. It will end when the number of vehicles to be placed on the market is reached.

Type approving authority « e »	2

Selection of solutions		Accepted	Refused
	A		X
	B	X	

TAAM Minutes:

The TAAM delegates decided in favour of solution B.

9. MISCELLANEOUS

9.1 Short report of the ETAES-Meeting, Chair ETAES

TAAM Minutes:

The Chairman, Mr. Frank Wrobel, of the ETAES-Meeting held on March 25, 2009 gave a short overview of the agenda items that had been covered.

Portugal was to date still not applying ETAES. The TAAM host country (Switzerland) offered to ask Portugal whether it would also like to participate in ETAES. In a reply dated April 13, 2009 Portugal said it was interested in gaining access to ETAES.

In summer 2009 a proposal for a Service Level Agreement would be sent to the participants concerning the financing of the ETAES system. The participants would then be able to comment on this proposal.

For the other items we refer to the minutes, which the UK would be drawing up.

The next ETAES meeting would be held on October 7, 2009.

9.2 2005/55/EC: Petrol engines under the heavy vehicles, Germany 5

Germany 5:

This issue shall be handled under miscellaneous as an information about the e1 approach concerning Petrol engines under the heavy veh. emission directive 2005/55/EC.

The **COMMISSION DIRECTIVE 2008/74/EC of** 18 July 2008 amending,
as regards the type approval of motor vehicles with respect to emissions from light passenger and commercial vehicles (Euro 5 and Euro 6) and access to vehicle repair and maintenance information, Directive 2005/55/EC of the European Parliament and of the Council and Directive 2005/78/EC introduce test procedures to enable type approval of heavy-duty engines and vehicles with **petrol engines.**

Annex V of the Directive 2005/78/EC defines the approval number and the special characters for the emission limits, the OBD-stage, the durability and NOx-emissions.

The Directive 2008/74/EC defines no new character for the petrol engines and vehicles.

Because of this lack in the Directive the KBA decided to grant approvals for petrol engines and vehicles **without** a character.

TAAM Minutes:

The TAAM delegates agreed that approval for petrol engines and vehicles would be issued under 2005/55/EC or 2005/78/EC, as applicable, without a character.

9.3 ECE-R44: Production qualification, Sweden 5

TAAM QUESTION 5, from Sweden for TAAM 2009-03-26 -- 27

SUBJECT: **Production qualification**

ECE REGULATION R44.04

RELEVANT SECTIONS:

Chapter 11 Production qualification
11.2 Qualifying the production of child restraint systems
The production of each **new approved type** of child restraint system of categories "universal", "semi-universal", and "restricted" must be subjected to production qualification tests.
For this purpose, a random sample of 5 child restraint systems will be taken from the first production batch.
The first production batch is considered to be the production of the first block containing a **minimum of 50 child restraint** systems and a maximum of 5.000 child restraint systems.

QUESTION / PROBLEM /CONCERN:

1.
Does “new approved type” mean only a completely new type of child restraint, or does it also include a restraint that earlier has been approved according to R44.03 and now is to be updated to R44.04?
2.
It says that 5 random samples should be taken from the first production batch containing a minimum of 50 restraint systems. What about products that are produced in much smaller batches, like special needs restraints?
Can such a product still be type approved and how is the production qualification test in that case handled?

1 A	A new type is a completely new, not earlier type approved product	
1 B	A new type includes types that have been type approved according to R44.***03***	
2	Sweden would like to know the opinion of the other member states on this and how it is generally handled in your countries.	

TAAM Minutes:

It was decided that a case-by-case approach had to be adopted on this matter.

Observations on this topic were to be sent to Sweden

9.4 ECE R117: Tyres without "S" - marking, Germany 7

TAAM Minutes:

Germany asked in addition the following question regarding "S" – marking of tyres:

Relevant points of Regulation ECE R117:

2.4.1:	**Class C1 tyres are those that correspond to Regulation ECE R30 .**
4.3, 5.4.2, Annex 2:	**The character "S" had to be placed after the approval mark.**
12.4:	**As from October 1, 2009 a contracting party had to prohibit the sale or commercialization of a C1-class tyre (with a cross-section width of ≤ 185) if it did not meet this regulation in terms of noise.**

Problem:

In Germany there were approx. 3 million tyres in warehouses which, although they met the regulations of ECE R117 in technical terms, did not bear any "S" - marking.

Question:

Could these tyres nevertheless continue to be sold or commercialized after October 1, 2009?

Solution:

Germany requested the TAAM delegates for feedback on how this was handled in their respective countries. The feedback was to be sent to [redacted]

9.5 Miscellaneous informations about Car Legislation, European Commission 5

TAAM Minutes:

The European Commission informed the meeting about the various activities in car legislation.

The information can be obtained from the enclosed Annex 11.1 of the European Commission.

9.6 ECE R51: Noise monitoring, European Commission 6

TAAM Minutes:

The European Commission informed the meeting about noise monitoring:

Relevant points of Regulation ECE R51:

5.1: Type approval shall only be granted if,

(b): starting at 1 July 2007 and for a maximum period of two years, the results of the test run of that vehicle in accordance with the measurement method B of Annex 10 have been added to the test report in Annex 9 and communicated to the European Commission and those Contracting Parties that express an interest in receiving data. This does not include any tests done in connection with the extension of existing approvals according to Regulation No 51. Furthermore, for the purpose of this monitoring procedure a vehicle is not considered to be a new type if the vehicle differs only in respect to paragraphs 2.2.1 and 2.2.2.

The following data had been submitted to date :

-	**By vehicle class:**	**M1:**	**417**
		M2:	**1**
		M3:	**28**
		N1:	**19**
		N2:	**19**
		N3:	**39**
		Total:	**523**
-	**Files by Member State:**	**Belgium:**	**27**
		Czech Republic:	**23**
		France:	**125**
		Germany:	**135**
		Italy:	**21**
		Luxembourg:	**37**
		Netherlands:	**78**
		Spain:	**16**
		UK:	**50**

Problem:

The data were not complete in some cases, which led to difficulties during evaluation. For some vehicles the indication of engine speed at N BB' during method A and/or method B was missing. For some cars no clear names were given and sometimes the proposed format of the test protocol were not respected.

<u>Solution:</u>

The European Commission requested the TAAM delegates to ensure that only complete data sets were submitted.

10. FUTURE MEETING

10.1 2009 Q3/Q4: Slovenia

TAAM Minutes:

The next TAAM Meeting would be held from October 7-10, 2009 in Slovenia.

Slovenia had set up a website for this purpose (www.taam.eu).

10.2 2010 Q1/Q2: Bulgaria

10.3 2010 Q3/Q4: Romania

TAAM Minutes:

Romania offered to host the autumn 2010 TAAM meeting.

11. ANNEXES

11.1 Item 9.5 Miscellaneous informations about Car Legislation