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## **FINAL AGENDA & NOTES**

1. **Opening of the Meeting.**
2. **Adoption of the Agenda.**
3. **Adoption of the minutes of Brussels Meeting.**
4. **Adoption of the minutes of Luxembourg Meeting.**
5. **Follow up on questions from previous meetings.**
  - 5.1. **Bratislava item 4.3;**  
Geneva item 5.5;  
Brussels item 4.3;  
Luxembourg item 4.3;  
**Regulation (ECE) R103.00 and Regulation (EC) 715/2007 on replacement pollution devices particulate filter provisions for testing (Germany)**  
**Awaiting the outcome of GRPE**
  - 5.2. **Bratislava item 4.4;**  
Geneva item 5.6;  
Brussels item 4.4;  
Luxembourg 5.2 ;  
**Regulation (ECE) R83.06 and Regulation (EC) 715/2007 on engine setting for type I test (UK)**  
**Defer to next TAAM pending progress to be made by GRPE**
  - 5.3. **Bratislava item 5.6;**  
Brussels item 4.6;  
Luxembourg 5.3 ;  
**Directive (EC) 2007/46 on Mobile Air Conditioning (MAC) for special purpose vehicles (UK)**  
**No new information, defer to next TAAM**
  - 5.4. **Bratislava item 5.26;**  
Brussels item 4.9;  
Luxembourg 5.4 ;  
Regulation (ECE) R107.03 and Directive (EC) 2007/46 on exits in buses and coaches (UK)  
**Defer to next TAAM pending progress to be made by GRSG (Jim H)**
  - 5.5. **Brussels item 5.26:**  
Luxembourg 5.6 ;  
Directive (EC) 2007/46 on multistage EC type approval granted after 29.10.2012 on base of a WVTA not amended by Regulation (EC) 678/2011. Meet Regulation (EC) 678/2011 or not? (Belgium)  
**Defer to next TAAM pending outcome from MSWG**
  - 5.6. **Brussels item 5.28:**  
Luxembourg 5.7 ;  
Regulation (EC) 630/2012 on tires used for testing (UK)  
**No new information, defer to next TAAM**

- 5.7. **Riga item 5.27:**  
Brussels item 6.3 on plastic glazing (UK)  
Luxembourg 5.8 ;  
**Tackle this question at the next TAAM meeting.**
- 5.8 **Directive (EC) 2007/46 – Annex, IX Para 4 and 4.1**  
Luxembourg 6.4;  
ECWVTA certificate of conformity (UK 1)  
**Referred to TAAEG**
- 5.9 **Luxembourg item 6.11**  
Number of seating positions (Netherlands)  
**Inform TAAM at the next meeting about the final solution.**
- 5.10 **Luxembourg item 6.12**  
Emissions for multi-stage vehicles (Romania)  
**Awaiting final decision from TCMV Nov 2013**
- 5.11 **Luxembourg item 6.13**  
Repair and maintenance information (Ireland)  
**Request European Commission to organise 2 sub-groups on COP and RMI in order to find a definite solution**
- 5.12 **Luxembourg item 6.19**  
Foldable device designed to reduce aerodynamic drag (Netherlands)  
**Referred to TA working group to be considered at next TAAM**
- 5.13 **Luxembourg item 10.1**  
Information of the status of the CoP and Product Safety measures concerning Directive 2006/40/E "MAC" and the new refrigerant R-1234yf (Germany1)  
**KBA to inform members by official letter and report back to TAAM**

## 6. Questions relating to framework Directive (EC) 2007/46 (motor vehicles)

- 6.1 **Directive (EC) 2007/46 EC Regulation 1230/2012,**  
Registration/in-service maximum permissible mass (Sweden)
- 6.2 **Directive (EC) 2007/46**  
Point 8 from the annex IX (COC)  
Fifth wheel lead in case of a coupling without slider (Netherlands)
- 6.3 **Directive (EC) 2007/46 - 97/27/EG (1230/2012) Annex 1, article 2.4.1**  
The following devices must not be taken into account:  
Lifting platforms, access ramps and similar equipment in running order, not exceeding 300 mm, provided that the loading capacity of the vehicle is not increased, (Netherlands)
- 6.4 **Directive (EC) 2007/46 - Annex II, Part A, paragraph 5**  
Special purpose vehicle which does not enter in any of the definitions mentioned in this section. (Netherlands)
- 6.5 **Directive (EC) 2007/46 - 109/2011 (and directive 91/226/EC - 2010/19/EU)**  
Spray suppression systems. (Netherlands)
- 6.6 **Directive (EC) 2007/46 - Annex II appendix 2**  
Digits used to supplement the codes to be used for various kinds of bodywork. (Netherlands)
- 6.7 **Directive (EC) 2007/46 - (EC) 65/2012**  
Gear Shift Indicator and fuel consumption savings verification (Spain)

- 6.8 **Directive (EC) 2007/46 – Article 5**  
Trailers with EC type-approval delivered to end customer as construction kit (Austria)
  - 6.9 **Directive (EC) 2007/46 – 692/2008**  
OBD IUPR monitoring of evaporative purge controls (UK)
  - 6.10 **Directive (EC) 2007/46 – 19/2011 – 1230/2012**  
Caravan mass on Statutory Plates and COCs (UK)
  - 6.11 **Directive 76/756 Installation of Lighting and Light-Signalling Devices**  
Trailer End Outline Markers (UK)
  - 6.12 **Directive 2007/46/EC & 94/20/EEC, Annex VII Paragraph 1.4**  
The mass of the vehicle combination must be stated in the EEC vehicle type approval certificate of the trailer. (UK)
  - 6.13 **Directive 2007/46/EC Article 32**  
Publishing information about recalls (UK)
  - 6.14 **2007/46/EC Annex IX and X**  
CoP measures and CoC (Germany4)
  - 6.15 **(GSR) REG (EC) No. 661/2009 and (EU) No. 1229/2012**  
UNECE R 17 and R 25 seats and head restraints, 2007/46/EC (Germany 5)
  - 6.16 **Directive 97/68/EC**  
Engines for mobile machinery (Germany6)
7. **Questions relating to framework Directive (EC) 2002/24 (two or three wheel motor vehicles)**
- 7.1 **Directive 2000/7/EC, Paragraph 2.2.3**  
Speedometers imperial marking (UK)
8. **Questions relating to framework Directive (EC) 2003/37 (agricultural or forestry tractors)**
- 8.1 **2009/144/EC**  
Use of upside-down orientation of a tractor drawbar (Germany3)
  - 8.2 **Directive 2009/144/EC**  
Certain components and characteristics of wheeled agricultural or forestry tractors (Switzerland)
9. **Questions relating to UNECE Regulations**  
None
10. **Other**
- 10.1 **Estimation of uncertainty of measurement ISO 17025**  
5.4.6 Estimation of uncertainty of measurement (Germany2)
  - 10.2 **Directive 2007/46/EC, Regulation no. 13**  
Type approval of trailer; brakes in combinations (CZ1)

- 10.3 Lighting components**  
Minimum requirements for Conformity of Production control procedures (NI7)
  
- 10.4 Directive 2007/46/EC**  
Motor Caravans (IRL2)
  
- 10.5 ETAES**  
Access to ETAES (IRL1)
  
- 10.6 Developments on the revision of the 1958 Agreement and Regulation 0 on the IWVTA**
  
- 10.7 Attendance of Japan in regular TAAM sessions.**
  
- 10.8 Next meeting.**

## Opening of the meeting

1. [redacted] of KBA welcomed all delegations for the meeting of TAAM in the Palais des Nations in Geneva.

The participations list is given in Annex 1 to this report

## Adoption of the agenda

2. The draft agenda has been approved with the addition of 5 new last minute topics:
  - a) lighting components.,
  - b) modifications into motor caravans prior to first registrations and
  - c) access to ETAES for vehicle registration services
  - d) developments on the revision of the 1958 Agreement and the IWVTA and
  - e) attendance of Japan to TAAM.These topics were tabled under agenda items 10.3 to 10.7.

## Adoption of the minutes of the meeting in Brussels

3. There are no requests for modification received and the report has been approved.

## Adoption of the repost of the Luxembourg meeting

4. The report of the meeting in Luxembourg of 6 and 7 June 2013 has been adopted without any modification.

## Meeting Questions and Notes

- 5.1. Regulation (ECE) R103.00 and Regulation (EC) 715/2007 on replacement pollution devices particulate filter provisions for testing (Germany)

The meeting agreed that it is not possible to approve a Particulate Filter without testing the filter ability (KI, Regeneration.) and only test its catalyser function. This question can be removed from the agenda of the next meeting.

- 5.2. Regulation (ECE) R83.06 and Regulation (EC) 715/2007 on engine setting for type I test (UK)

No additional information was available and this question should be deferred to the next TAAM pending progress to be made by GRPE to be provided by UK.

- 5.3. Directive (EC) 2007/46 on Mobile Air Conditioning (MAC) for special purpose vehicles (UK)

The problem of the provisions for the air conditioning for motor caravans with a mass of more than 2,5 t will soon be solved by the new Annex XI to 2007/46/EC. The relevant part of the proposal reads:

“Appendix 1

Motor-Caravans, Ambulances and Hearses

Item	Subject	Regulatory act reference	M <sub>1</sub> ≤ 2 500 kg (*)	M <sub>1</sub> > 2 500 kg (*)	M <sub>2</sub>	M <sub>3</sub>
61	Air-conditioning system	2006/40/EC	X	G ( <sup>14</sup> )		

G In case of multi-stage approval, requirements according to the category of the base/incomplete vehicle (e.g. the chassis of which was used to build the special purpose vehicle) may also be used.

(<sup>14</sup>) Applies only for vehicles of category N<sub>1</sub>, class I (reference mass ≤ 1305 kg) “.

TAAM agreed that these provisions should not yet be applied as long as this amendment has not been adopted officially.

- 5.4. Regulation (ECE) R107.03 and Directive (EC) 2007/46 on exits in buses and coaches (UK)

**No information from GRSG. UK needs to progress this at GRSG or withdraw it. Carry over to next TAAM.**

- 5.5. Directive (EC) 2007/46 on multistage EC type approval granted after 29.10.2012 on base of a WVTA not amended by Regulation (EC) 678/2011. Meet Regulation (EC) 678/2011 or not? (Belgium)

**This is for discussion at Multistage WG. Latvia is to prepare question for the meeting next week and report back to next TAAM.**

- 5.6. Regulation (EC) 630/2012 on tires used for testing (UK)

**The meeting agreed that only tyres fitted on production vehicles should be considered. (If winter tyres are not fitted to production vehicles they should not be considered. However, winter tyres can be referenced in ‘Remarks’ in the COC).**

- 5.7. Plastic glazing (UK)

**No further information provided. Defer to next TAAM. UK will provide additional data.**

- 5.8 **Directive (EC) 2007/46 – Annex, IX Para 4 and 4.1**  
ECWVTA axle data in certificate of conformity (UK 1)

It seems that this new entry was introduced with Regulation 385/2009. Antony Lagrange will look in the archives and advise on the background for this new entry.

In his view for 1 axle trailers, only paragraph 4 should be filled.

For centre axle trailers with one axle complete only item 4. (The distance from the vertical axis of the coupling/kingpin to the first axle should be recorded).

If it has more than one axle only item 4.1 should be completed.  
(Further axle spacing is recorded as Axle 1 – 2, 2 – 3, etc.).

KBA will send a list of proposed entries to the question 5.8 of axle data and spacing to clarify together with UK, NL, Swe, Fin, D how the different countries need the entries!

The responses to the proposal may generate a need to revisit this question at the next TAAM.

**5.9** Number of seating positions (Netherlands)

How to determine the width at the seat cushion level in case of a 2<sup>nd</sup> row bench?

The meeting chose a new answer 'C'

When there is a space of 1200 mm at the seat cushion level, there are no obstructions, and sufficient leg/foot room, the bench must be counted as a three seats.

When there are obstructions within the 1200mm (eg. Fixed console box) or an unpadding area, insufficient leg/foot room or seats labelled only for use when the vehicle is stationary then the bench may be counted as less than 3 seats.

**5.10** Emissions for multi-stage vehicles (Romania)

Waiting for final decision from TCMV in November 2013  
Romania not present - Item carried over to next TAAM.

(Note by the secretariat:

The draft amendment for Annex XVII to 2007/46/EC contains the following text:  
"3.6. If the vehicle has changed category at the current stage, the relevant requirements for the new category from that legislative act must be fulfilled. The type-approval certificates from the old category may be accepted provided that the requirements are the same between the old and the new category.")

**5.11** Repair and maintenance information (Ireland)

Request the European Commission to organise 2 sub-groups on COP and RMI in order to find a definite solution.

Finland reported on the RMI/COP meeting held in October in Helsinki.  
An Excel spread sheet will soon be sent out to TAAM delegates requesting feedback to present to the 2014 COP meeting in April 2014.

TAAM agreed on the need to seek for a solution on the again upcoming difficulties with data access to vehicle OBD and RMI. TAAM welcomed the suggestion to request the European Commission to invoke Recital 18 and to take the lead to organize, in advance of the next TAAM, meetings of the 2 subgroups on COP and RMI in order to find a definite solution on this subject.

The draft report of the RMI subgroup is given in Annex 2 to this report. The report of the CoP group is attached as annex 3.

- 5.12 Fold-able device designed to reduce aerodynamic drag (Netherlands)  
Referred to TA working group to be considered at next TAAM

**No response from TCMV. Accept answer B in amended format: (The folded-up aerodynamic device must be taken into account for the determination of the outermost length of the vehicle) until the issue is considered and resolved at TCMV.**

- 5.13 Information of the status of the CoP and Product Safety measures concerning Directive 2006/40/E "MAC" and the new refrigerant R-1234yf (Germany1)  
KBA to inform members by official letter and report back to TAAM

KBA-Risk-assessment concerning MAC systems using R1234yf (Germany1)

The KBA would like to inform the TAAM members about the final report to the KBA-Risk-assessment concerning MAC systems using R1234yf.



X:\Abteilung4\  
Abteilung4\_Allgemein

1. See attached document:

There will be more detailed information available on our website soon in English, at the time the annexes to the report are solely in German!



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[www.kba.de](http://www.kba.de)

**KBA presented the Risk Assessment report on use of R1234yf refrigerant, with support from the UK.**

**The EU Commission is unhappy about the use of extensions to existing approvals using old refrigerants and is considering infringement procedures against Member States. A decision from the Commission is pending.**

**The EU Commission meeting in January 2014 should consider whether legislation needs to change.**



## 6. Questions relating to framework Directive (EC) 2007/46 (motor vehicles)

### 6.1 Directive (EC) 2007/46 EC Regulation 1230/2012, Registration/in-service maximum permissible mass (Sweden)

SUBJECT: Registration/in-service maximum permissible masses

REGULATION: COMMISSION REGULATION (EU) No 1230/2012

RELEVANT SECTION: Article 5:

1. For the purposes of registration and entry into service of vehicles type-approved under this Regulation, national authorities shall determine, for each variant and version within the type of vehicle, all of the following masses that are permitted for national traffic or for international traffic under Directive 96/53/EC:

- (a) the registration/in-service maximum permissible laden mass;
- (b) the registration/in-service maximum permissible mass on the axle(s);
- (c) the registration/in-service maximum permissible mass on the group of axles;
- (d) the registration/in-service maximum permissible towable mass;
- (e) the registration/in-service maximum permissible laden mass of the combination.

QUESTION:

We have some concerns about the interpretation of Article 5 in the regulation and we would be grateful if you would give your opinions on the following:

Option	Solutions	Comments
1	What is your opinion about the purpose of article 5 and the reasons for the national authorities to determine these masses?	Some member states have lower permitted mass than permitted by ECWVTA
2	What will the pre-determined information on masses be used for more specifically?	To identify and comply with national limitations on mass and to assist driver to know vehicle limits
3	Where will this data be registered and stored? For example – is this information supposed to be included in the vehicle registration certificate?	Yes, it can be included in the vehicle registration certificate, and can be used for roadside enforcement
4	Will this information be available to other member states?	Varies between Member States

**Sweden to prepare a questionnaire for delegates to respond to for next TAAM**

## 6.2 Directive (EC) 2007/46

Point 8 from the annex IX (COC)

Fifth wheel lead in case of a coupling without slider (Netherlands)

### Text:

#### 0. OBJECTIVES

The certificate of conformity is a statement delivered by the vehicle manufacturer to the buyer in order to assure him that the vehicle he has acquired complies with the legislation in force in the European Union at the time it was produced. The certificate of conformity also serves the purpose to enable the competent authorities of the Member States to register vehicles without having to require the applicant to supply additional technical documentation. For these purposes, the certificate of conformity has to include:

(a) the Vehicle Identification Number;

(b) the exact technical characteristics of the vehicle (i.e. it is not permitted to mention any range of value in the various entries).

Complete(d) vehicles:

8. Fifth wheel lead for semi-trailer towing vehicle (maximum and minimum): ..... mm

9. Distance between the front end of the vehicle and the centre of the coupling device:  
..... mm

Incomplete vehicles:

8. Fifth wheel lead for semi-trailer towing vehicle (maximum and minimum): ..... mm

### Question:

In case of semi-trailer vehicle the fifth wheel, **without slider**, has normally one value for point. 8 and 9.

Example:

8. Fifth wheel lead for semi-trailer towing vehicle (maximum and minimum): 560 mm.

9. Distance between the front end of the vehicle and the centre of the coupling device:  
4500 mm

In case of semi-trailer vehicle the fifth wheel, **with slider**, has a value for the minimum and maximum value for this entry:

Example:

8. Fifth wheel lead for semi-trailer towing vehicle (maximum and minimum): 360-660 mm.

9. Distance between the front end of the vehicle and the centre of the coupling device:  
4400-4700 mm

There are manufacturers who state a minimum and maximum value in case of a complete(d) vehicle **without fifth wheel slider**.

Example:

8. Fifth wheel lead for semi-trailer towing vehicle (maximum and minimum): 360-660 mm.

9. Distance between the front end of the vehicle and the centre of the coupling device:  
4500 mm

Is it acceptable to use point 8. to give a range for the fifth wheel lead in case of a coupling without slider?

Or should the exact technical characteristics of the vehicle be stated on the COC?

Option	Solutions:	Accept	Reject
<b>A</b>	Yes, it is acceptable to state a range on the COC although the vehicle has no slider. It is welcome information for the registration authority when the fifth wheel is replaced after first registration.		<b>X</b>
<b>B</b>	No, only the exact value should be stated. Only in case: 1. of a incomplete vehicle without coupling device it is acceptable to state the min- and max value 2. of a complete(d) vehicle with coupling device with slider	<b>X</b>	

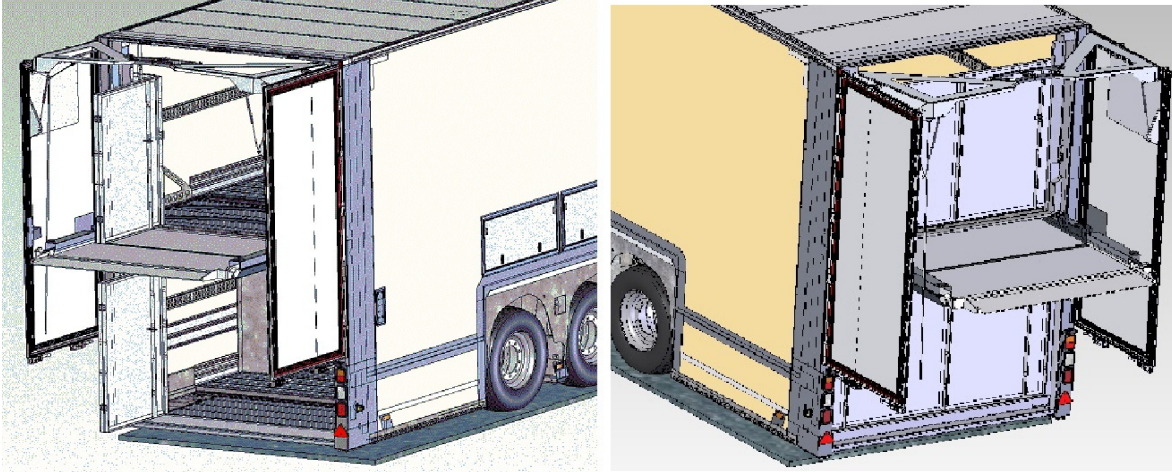
**The meeting accepted Option B as correct, and the COC must represent the vehicle as delivered. The meeting also recognised that there may be acceptable alternative positions and that this should be recorded in the remarks in item 52 of the COC.**

**6.3 Directive (EC) 2007/46 - 97/27/EG (1230/2012) Annex 1, article 2.4.1**

The following devices must not be taken into account:

Lifting platforms, access ramps and similar equipment in running order, not exceeding 300 mm, provided that the loading capacity of the vehicle is not increased, (Netherlands)

<b>Text:</b>
lifting platforms, access ramps and similar equipment in running order, not exceeding 300 mm, provided that the loading capacity of the vehicle is not increased,

<b>Question:</b>
<p>According to article 2.1.4 of annex1 a lifting platform (not exceeding 300mm) must not be taken into account when determining the length of a vehicle.</p> <p>A trailer manufacturer has made a double deck trailer, exceeded the length by 300mm and incorporated the lift platform in the extra space.</p> <ol style="list-style-type: none"> <li>1. Is this construction acceptable if the 300 extra mm are sealed off with a set of extra inner doors to prevent enlargement of the cargo space (unfair competition)?</li> <li>2. Is this construction acceptable if the 300 extra mm are <b>not</b> sealed off with a set of extra inner doors to prevent enlargement of the cargo space (unfair competition)?</li> </ol>


Option	Solutions question 1:	Accept	Reject
<b>A</b>	This construction is acceptable when the 300 extra mm are sealed off with a set of extra inner doors to prevent enlargement of the cargo space.		<b>X</b>
<b>B</b>	This construction is not acceptable even though the 300 extra mm are sealed off with a set of extra inner doors to prevent enlargement of the cargo space.	<b>X</b>	
<b>C</b>	This construction is not allowed	<b>X</b>	

**The general consensus of the meeting was that this construction is not acceptable. There is also the risk of enclosed lift arrangements being used for additional loading and this is contrary to the legislation.**

**6.4 Directive (EC) 2007/46 - Annex II, Part A, paragraph 5**

Special purpose vehicle which does not enter in any of the definitions mentioned in this section. (Netherlands)

**Text:**

5.8. Special group: SG, a special purpose vehicle which does not enter in any of the definitions mentioned in this section.

**Question:**

There are vehicles (truck's) which will be used for different purposes. A truck which is used during 80% of the year as a tipper truck can be used in the winter months as a snow plough.

If it runs during the 80% of the year the vehicle can be considered as a "normal" truck

During the remaining 20%, equipped with a snow plough, it could be considered as a special purpose vehicle. Using the truck with a snow plough will give problems to comply with the AEBS and LDWS legislations

Option	Solution	Accept	Reject
A	The main function of the truck should be considered for the classification. This is a normal truck and not a special purpose vehicle.	X	
B	This is both a special purpose vehicle as a normal truck. When snow plough is fitted it is a special purpose vehicle and it doesn't have to comply with AEBS and LDWS.. These systems can be switched of when the snowplough is fitted.		
C	This is a special purpose vehicle. Even if the snow plough is not fitted for 80% of the time.		

**The meeting accepted answer A. There were concerns over loopholes being otherwise created. Generally these vehicles are based on normal truck chassis so there is no reason not to require certain systems and the legislation allows the LDWS and AEBS to be switched off, so there is no problem for using the vehicles with a snow plough.**

**A new Annex including reference to multi equipment carriers is being drafted, which may help with the classification of these vehicles.**

**It was agreed that Netherlands should provide pictures of such vehicles so that this item can be carried over and discussed at the next TAAM.**

**6.5 Directive (EC) 2007/46 - 109/2011 (and directive 91/226/EC - 2010/19/EU)**  
Annex IV, item 0.2. General  
Spray suppression systems. (Netherlands)

**Text:**

0.2.

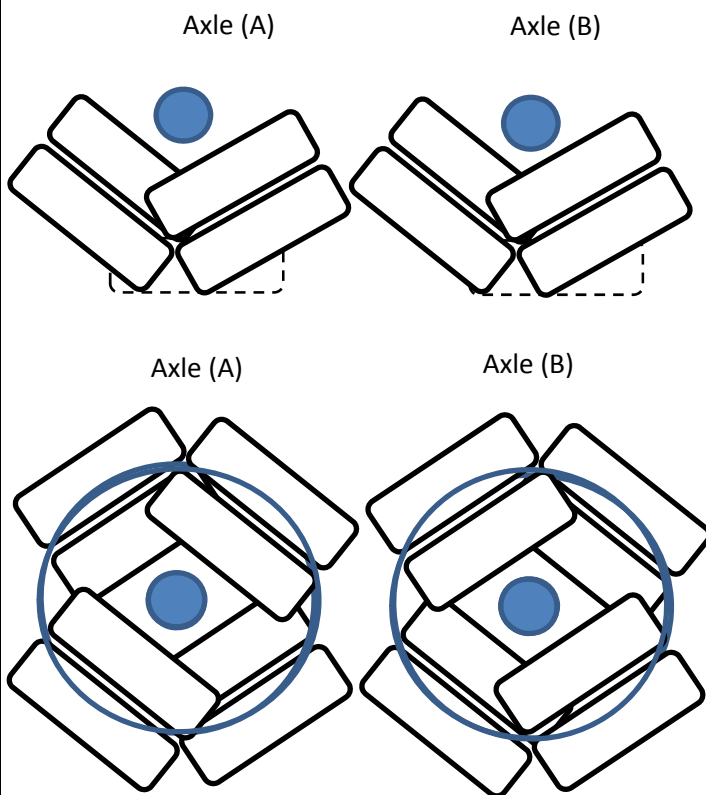
The requirements of this Annex relating to spray-suppression devices, as defined in Article 2(4), are not mandatory for categories N, O 1 and O 2 vehicles with a permissible maximum laden mass not exceeding 7,5 tonnes, chassis/cab vehicles, un-bodied vehicles or vehicles on which the presence of spray-suppression devices would be incompatible with their use. However, if such devices are fitted to those vehicles, they must conform to the requirements of this Regulation.

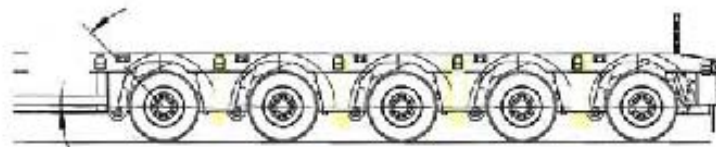
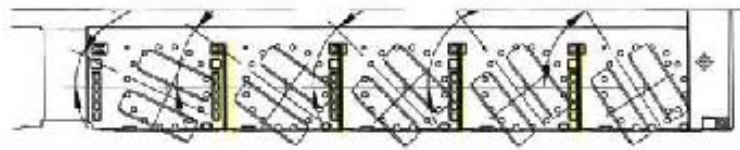
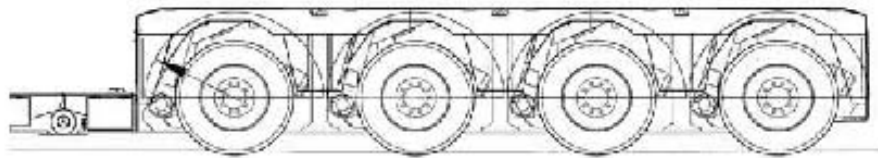
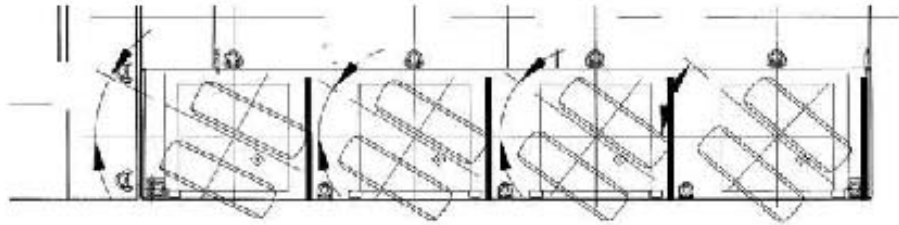
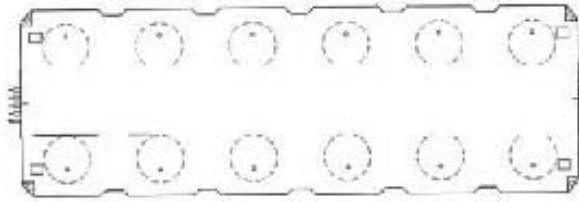
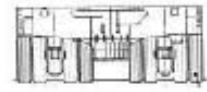
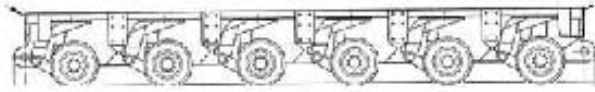
**Question:**

Only spray-suppression devices on which the presence would be incompatible with their use, are not mandatory for the categories mentioned in 0.2.

Shouldn't exemption also be granted in case of interference between the spray-suppression system and the steered axles of for example a Low bed semi-trailer? see pictures below.

fusee or swing axle





Option	Solutions	Accept	Reject
<b>A</b>	Yes, exemption in case of interference between the spray-suppression system and the steered axles of for example a Low bed semi-trailer is necessary to prevent damaging the spray-suppression system (including fenders, mudguards etc.).	<b>X</b>	
<b>B</b>	No, exemption is not allowed.		<b>X</b>

**The meeting agreed Option A on a case by case basis provided the exemption is necessary because the requirement cannot be met, and it should be recorded in the Type Approval documentation.**



## 6.6 Directive (EC) 2007/46 - Annex II appendix 2

Digits used to supplement the codes to be used for various kinds of bodywork.  
(Netherlands)

### Text:

Digits used to supplement the codes to be used for various kinds of bodywork

14 Vehicle transporter

24 Recovery vehicle

26 Crane lorry (other than a mobile crane as defined in Section 5 of Part A of Annex II)

0.4. Where necessary (especially for the types of bodywork referred to respectively in points 3.1 and 3.6 and in points 4.1 to 4.4), they shall be supplemented by two digits.

### Question:

The differences between vehicles which are used for the transport and/or recovery of vehicles are minor. The use after registration, colours, markings or lightning of a vehicle is not a part of the bodywork.





Option	Solutions	Accept	Reject
<b>A</b>	The bodywork should be: <ol style="list-style-type: none"> <li>1. Recovery vehicle</li> <li>2. Crane lorry</li> <li>3. Vehicle transporter</li> </ol>	<b>X</b>	
<b>B</b>	The bodywork should be: <ol style="list-style-type: none"> <li>1. Recovery vehicle</li> <li>2. Recovery vehicle</li> <li>3. Recovery vehicle</li> </ol>		<b>X</b>

**The meeting agreed Option A based on Manufacturer proposal, to be discussed and agreed with the Type Approval Authority.**

**6.7 Directive (EC) 2007/46 - (EC) 65/2012**  
 Gear Shift Indicator and fuel consumption savings verification (Spain)

**Text:**

**Regulation (EC) No 65/2012 Annex I, point 2.1**  
*"The GSI shall suggest changing the gear when the fuel consumption with the suggested gear is estimated to be lower than the current one giving consideration to the requirements laid down in points 2.2 and 2.3."*

**Regulation (EC) No 65/2012 Annex I, point 4**  
*"The fuel economy impact of GSI recommended gear shift points shall be determined according to the following procedure"*

**Point 4.5 Determination of the model fuel consumption**  
*FC<sub>GSI</sub> shall denote the fuel consumption of the vehicle when the driver follows the advice of the GSI:*  

$$FC_{GSI}^{n} = FC_{i}^{n}, \text{ where } V_{GSI}^{n-1} \leq v_i < V_{GSI}^n \text{ (for } n = 1, \dots, \#g) \text{ and } FC_{GSI}^{n} = 0 \text{ if } v_i \geq V_{GSI}^{\#g}$$

$$FC_{GSI} = \sum_{i=1}^{28} P_i \times FC_{GSI}^{n} / 100$$

*FC<sub>std</sub> shall denote the fuel consumption of the vehicle when standard gear shift points are used:*  

$$FC_{std}^{n} = FC_{i}^{n}, \text{ where } V_{std}^{n-1} \leq v_i < V_{std}^n \text{ (for } n = 1, \dots, \#g) \text{ and } FC_{std}^{n} = 0 \text{ if } v_i \geq V_{std}^{\#g}$$

$$FC_{std} = \sum_{i=1}^{28} P_i \times FC_{std}^{n} / 100$$

*The relative saving of fuel consumption by following the advice of the GSI of the model is calculated as:*  

$$FC_{rel. Save} = (1 - FC_{GSI} / FC_{std}) \times 100 \%$$

**Question:**

How is it verified the point 2.1 of Annex I and which is the acceptance criteria?

Option	Solution	Accept	Reject
A	According to the procedure defined in item 4 and FC <sub>rel. Save</sub> must be 0 (zero) or higher		X
B	According to the procedure defined in item 4 and FC <sub>rel. Save</sub> must be higher than 0 (zero)	X	

**The meeting agreed Option B. The need to change gear for improved fuel consumption is only relevant when the sum of the fuel consumption save over all the gears is greater than 0.**

## 6.8 Directive (EC) 2007/46 – Article 5

Trailers with EC type-approval delivered to end customer as construction kit  
(Austria)

### LEGISLATION

Article 5

Obligations of manufacturers

1. The manufacturer is responsible to the approval authority for all aspects of the approval process and for ensuring conformity of production, whether or not the manufacturer is directly involved in all stages of the construction of a vehicle, system, component or separate technical unit.

### Discussion

Trailers having EC type-approval are delivered to the end customer as construction kit . The trailer has to be assembled by the customer like a furniture from a big Swedish furniture store (no allen wrench included, but COC included)



Motorradanhänger > PM 310 Motorradtransporter

### PM 310 Motorradtransporter

Leichter und praktischer Motorradanhänger für 1 Motorrad.

**549,00** EUR

inkl. MwSt (19%) zzgl. Versand

Lieferzeit: **2-3** Tage sofort lieferbar

Auffahrschiene für schwerere Motorräder:

### **Question:**

Is it allowed to deliver a vehicle having EC type-approval to the end user as construction kit?

Option	Solution	Accept	Reject
A	e12: NO! End user is not part of COP, has no expertise on vehicle manufacturing, etc.	X	

**The meeting agreed Option A as it is not possible to approve the end user as constructor and responsible for CoP.**

**6.9 Directive (EC) 2007/46 – 692/2008 Annex XI Appendix 1 paragraph 3.6.2  
566/2011 preamble 5  
OBD IUPR monitoring of evaporative purge controls (UK)**

**Regulation name:** Emissions from light passenger and commercial vehicles (Euro 5 and Euro 6)

**LEGISLATION**

**EC 692/2008 Annex XI Appendix 1**

3.6.2. For specific components or systems that have multiple monitors, which are required to be reported by this point (e.g. oxygen sensor bank 1 may have multiple monitors for sensor response or other sensor characteristics), the OBD system shall separately track numerators and denominators for each of the specific monitors except those monitoring for short circuit or open circuit failures and report only the corresponding numerator and denominator for the specific monitor that has the lowest numerical ratio. If two or more specific monitors have identical ratios, the corresponding numerator and denominator for the specific monitor that has the highest denominator shall be reported for the specific component.

**566/2011 - PREAMBLE**

(5) Due to its permanent nature, the monitoring of electric circuits should be exempt from the reporting resulting from the in-use-performance-ratio requirements on the OBD system.

**Discussion**

This statement is the result of investigations with IVS regarding OBD IUPR monitoring, and is the result of discussions when the Regulation was adopted. However, the wording of 566/2011 preamble has cast some doubt on this in some areas. The UK DfT view on this is:

*It's not permissible to exclude continuously monitored circuits from the OBD IUPR monitoring requirement. This point was discussed when the Regulation was adopted, ACEA and UK sought an exemption from IUPR logging for continuously monitored circuits, but we did not secure this. The Regulation must therefore be interpreted as requiring IUPR monitoring for these functions.*

Further discussion with IVS resulted in the following statement:

*".....it permits exclusion of monitors that are checking simply for circuit continuity from continuous recording, but not the condition monitors that are being served by those circuits. .... The Recitals are supposed to be there to assist interpretation of the main text, and so there should always be something in the main text that they are referring to. Paragraph 3.6.2 seems, in this case, to be the only likely target of the Recital."*

**Question 1:**

Should continuously monitored circuits be exempt from OBD IUPR monitoring?

<b>Option</b>	<b>Solution</b>	<b>Accept</b>	<b>Reject</b>
<b>A</b>	Constantly monitored circuits should be excluded from the IUPR requirements.	<b>X</b>	
<b>B</b>	Monitors checking simply for circuit continuity can be excluded from the IUPR requirements.	<b>X</b>	
<b>C</b>	Condition monitors served by the continuously monitored circuits are not exempt from the IUPR requirements.	<b>X</b>	
<b>D</b>	To be adopted at next TAAM?	<b>X</b>	

**The meeting agreed that UK should revise/clarify the question and re-submit.**

**6.10 Directive (EC) 2007/46 – 19/2011 – 1230/2012**  
Caravan mass on Statutory Plates and COCs (UK)

**Regulation:** EC 2007/46, EC 19/2011

**Regulation name:** ECWVTA and Statutory Plates and Inscriptions

**LEGISLATION**

**EC 2007/46**

Article 18

4. The certificate of conformity shall be completed in its entirety and shall not contain restrictions as regards the use of the vehicle other than those provided for in a regulatory act.

Annex IX

For these purposes, the certificate of conformity has to include:

- (a) the Vehicle Identification Number;
- (b) the exact technical characteristics of the vehicle (i.e. it is not permitted to mention any range of value in the various entries).

1.3. Without prejudice to the provisions in Section O(b), the values and units indicated in the second part shall be those given in the type-approval documentation of the relevant regulatory acts. In case of conformity of production checks the values shall be verified according to the methods laid down in the relevant regulatory acts. The tolerances allowed in those regulatory acts shall be taken into account.

**EC 19/2011**

Annex I

2. Information to be mentioned on the manufacturer's statutory plate

2.1. The following information shall be printed indelibly on the manufacturer's statutory plate in the order listed:

- (a) the manufacturer's company name;
- (b) the whole vehicle type-approval number;
- (c) the vehicle identification number;
- (d) the technically permissible maximum laden mass;
- (e) the technically permissible maximum mass of the combination;
- (f) the technically permissible maximum mass on each axle listed in order from front to rear.

## Discussion

ECWVTA requires that a COC is issued for each vehicle, that is completed in its entirety and does not contain any restrictions as to the use of the vehicle. It shall contain the exact technical characteristics of the vehicle and is not permitted to mention any range of the values that are taken from the approval documentation for the relevant regulatory acts.

EC 19/2011 requires the Manufacturer's Statutory Plate that includes the Technically Permissible Maximum Laden Mass.

Caravan manufacturers and distributors/dealers have expressed concern about selling caravans to customers when the customer's tow vehicle has a towing capability that is less than the TP Max Mass of the caravan.

The legislation seems quite clear that the weight to be placed on the Statutory Plate, and on the COC, of a caravan is its Tech Permitted Max Weight.

However, if a caravan has a Tech Permitted weight of 1750kg and actually weighs 1300kg un-laden, this allows 450kg payload for the caravan but, if a customer has a max towing weight capability of 1500kg, he could tow the caravan if he keeps the payload down to 200kg except that the Stat Plate says 1750kg and is he therefore not allowed to tow it? If the caravan was plated at 1500kg he could tow it.

Another customer with a larger tow vehicle may want the extra carrying capacity of the same caravan and would therefore need the van to be plated and COC'd at the 1750kg weight. (The caravans in question being identical apart from the towing vehicle), and this could apply to a multitude of vehicles with towing capability anywhere between the 'Tech Max Permitted' and 'Un-laden plus some arbitrary payload amount'.

(The dealers want to be able to offer to their customer's trailer caravans to suit their towing vehicles. Some customers want maximum carrying capacity and others want the space of the caravan, but not its high payload capacity, from the same specification caravan).

## Question 1:

In order to accommodate this matching of vehicle towing capability to plated caravan weights the caravan distributors/dealers would like to be able to plate and COC caravans at a variety of weights, to suit the customer's requirements and towing vehicle. At present this is the caravan manufacturer's responsibility.

Is this allowed within Type Approval? Pragmatically it seems right, but is it allowed, or is it only possible if it is done under the control of the manufacturer?



Option	Solution	Accept	Reject
<b>A</b>	Manufacturers to include multiple weights and versions of caravans in their Type Approvals, and supply/control the fitment/issue of appropriate Statutory Plates and COCs applied at the point of sale.	<b>X</b>	
<b>B</b>	Manufacturers always fit/supply the Statutory Plates/COCs relevant to the single Technically Permitted Max weight for that specification of caravan.		<b>X</b>

**The meeting agreed Option A provided there is adequate control by the manufacturer on the fitment of the correct plates and COCs.**

**Question 2 was discussed and withdrawn as it is an information gathering exercise rather than a TAAM question requiring an answer.**

## 6.11 Directive 76/756 Installation of Lighting and Light-Signalling Devices Trailer End Outline Markers (UK)

### Installation of Lighting and Light-Signalling Devices

#### LEGISLATION

#### 6.13.4 Position

##### 6.13.4.1 In width:

Front and rear: as close as possible to the extreme outer edge of the vehicle. This condition is deemed to have been met when the point on the apparent surface in the direction of the reference axis which is farthest from the vehicle's median longitudinal plane is not more than 400 mm from the extreme outer edge of the vehicle.

##### 6.13.4.2. In height:

Front: Motor vehicles - the horizontal plane tangential to the upper edge of the apparent surface in the direction of the reference axis of the device shall not be lower than the horizontal plane tangential to the upper edge of the transparent zone of the wind-screen.

Trailers and semi-trailers - at the maximum height compatible with the requirements relating to the width, design and operational requirements of the vehicle and to the symmetry of the lamps

Rear: At the maximum height compatible with the requirements relating to the width, design and operational requirements of the vehicle and to the symmetry of the lamps.

Both optional and mandatory (as applicable) lamps to be fitted as far separated in height as practicable and compatible with design/operational requirements of the vehicle and symmetry of the lamps.

#### Discussion

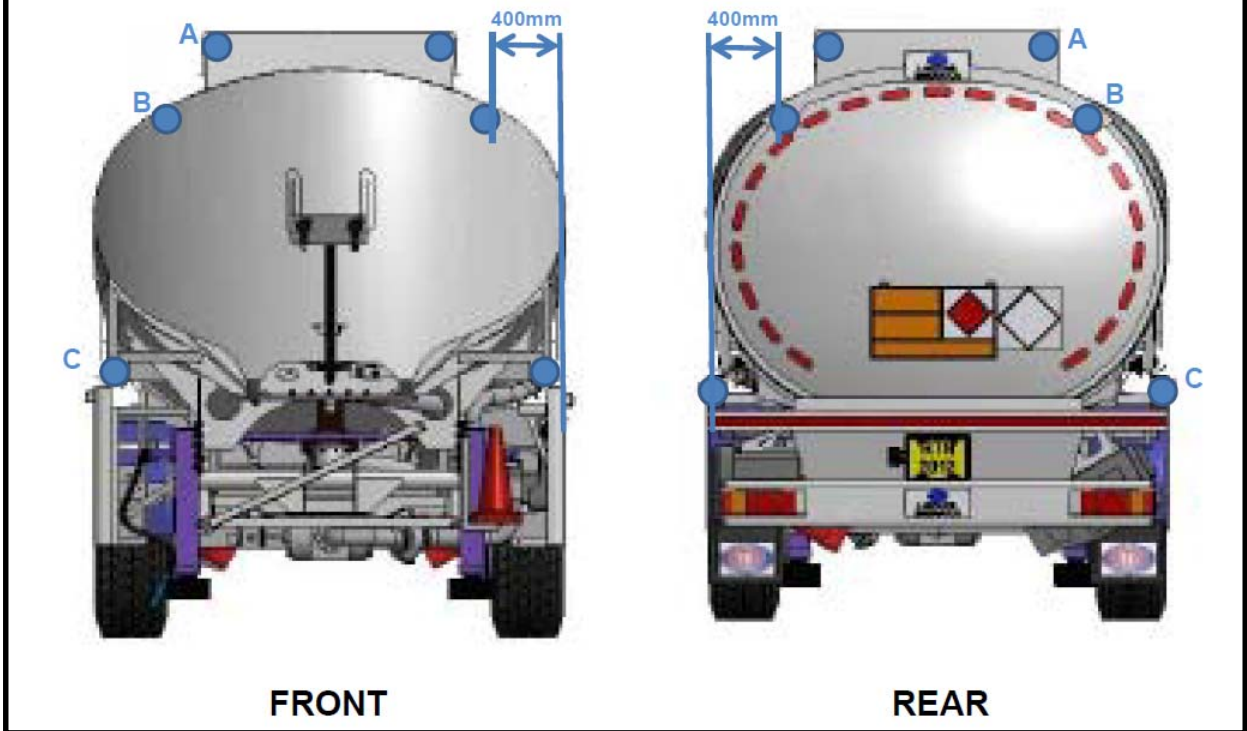
Mandatory End Outline Markers need to be fitted at "maximum height".

Certain body styles require the various "compatible with" clauses to be considered, such as:

1. Shape of body.
2. Obscuration of positions by sheeting.
3. Nature of body i.e.
  - a. Tank container requiring attachments for the lights and associated cables.
  - b. Tipping body requiring very long cables (around pivot and back to front).
4. Certain positions will produce a nuisance when using the vehicles rear view mirrors.

**Question 1:**

What is an acceptable position for the Mandatory End Outline Markers on the following semi-trailer?

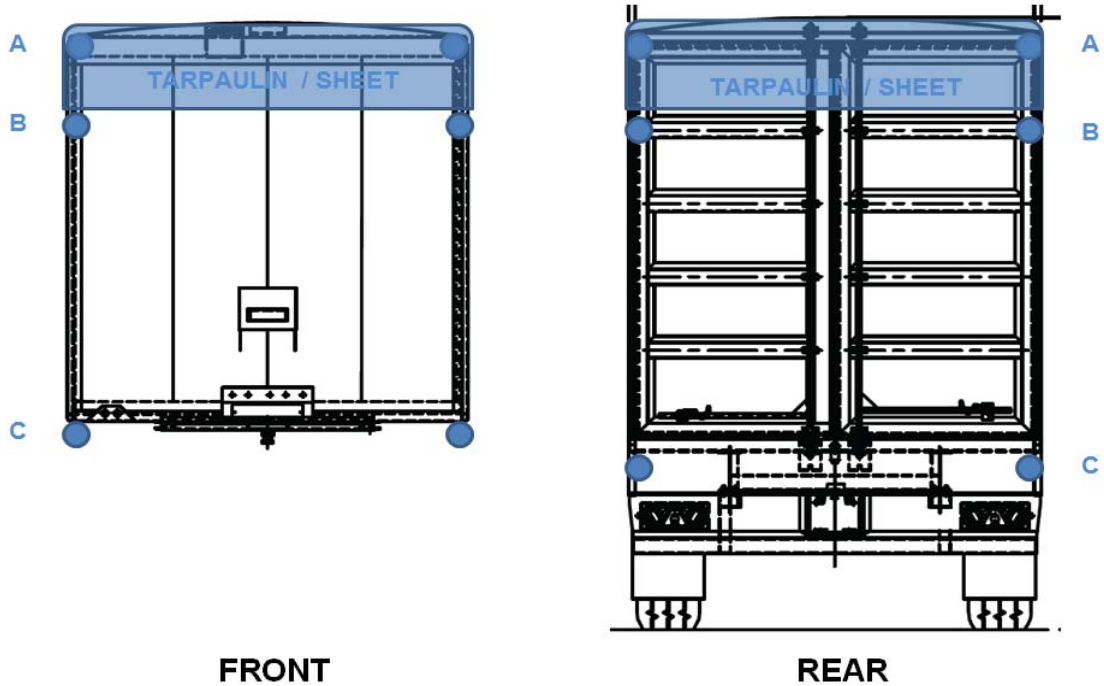


Option	Solution	Accept		Reject	
		Front		Front	
A	Would be more than 400mm from extreme outer edge of vehicle	Front		Front	
		Rear		Rear	
B	Maximum height compatible with width (i.e. ≤400mm from extreme outer edge) but requires fixing onto the tank container and wiring. May result in light nuisance in mirrors of towing vehicle	Front	X	Front	
		Rear	X	Rear	
C	No fixings to tank container necessary	Front	X	Front	
		Rear	X	Rear	
D	Lamps fitted to stalks/supports	Front		Front	
		Rear		Rear	

The meeting agreed Option B but recognized that Option C may be acceptable with some types of tank/load, subject to TAA discretion.

**Question 2:**

What is an acceptable position for the Mandatory End Outline Markers on the following semi-trailer? (Note body is a tipping body, the top part of which is covered by a tarpaulin sheet in operation.)



Option	Solution	Accept		Reject	
		Front	Rear	Front	Rear
A	Position would be covered by Tarpaulin Sheet	Front		Front	
		Rear		Rear	
B	Maximum height compatible with operational requirements (Tarpaulin Sheet). May result in light nuisance in mirrors of towing vehicle	Front	X	Front	
		Rear	X	Rear	
C	Position on chassis rather than tipping body	Front		Front	
		Rear		Rear	

The meeting agreed Option B, but recognized that for vehicles with rear doors compatibility with operational requirements may require Option C, with TAA authority agreement.

**Question 3:**

Which of the following Requirements should be considered in relation to their “compatibility” with the position of the mandatory End Outline Markers?

<b>Requirement to be considered for compatibility with EOM position (UK opinion)</b>	<b>Accept</b>	<b>Reject</b>
Shape of body.	X	
Obscuration of positions by sheeting.	X	
Tank container requiring attachments for the lights and associated cables. (Some judgement to remain in case of tanks where attachment may be infeasible).	X	
Tipping body requiring very long cables (around pivot and back to front).		X
Certain positions will produce a nuisance when using the vehicles rear view mirrors.		X

**The meeting agreed that it is not appropriate to provide a definitive acceptability list.**

**However, the general consensus was that shape of body, obscuration by sheeting, and some tanks do provide examples of acceptable reasons for accepting alternative locations.**

**Long cables and mirror nuisance are generally not considered to be good reasons for accepting alternative locations.**

## 6.12 Directive 2007/46/EC & 94/20/EEC, Annex VII Paragraph 1.4

The mass of the vehicle combination must be stated in the EEC vehicle type approval certificate of the trailer. (UK)

### LEGISLATION

- 1.4 When mounting coupling devices of Classes B, D, E and H on trailers, a value of 32 tonnes for the maximum mass T of the towing vehicle must be taken into account for D-value calculation. If the D-value of the coupling device is not sufficient for T = 32 tonnes, the resulting restriction on the mass T of the towing vehicle or the mass of the vehicle combination must be stated in the EEC vehicle type approval certificate of the trailer (Annex IX).

### Discussion:

When using R55 to support an ECWVTA of a trailer there is no such provision and it is unclear how to treat this item.

### Question:

How should this be handled in ECWVTA?

Option	Solution	Accept	Reject
A	Carry on with the procedure used in 94/20		X
B	ECWVTA of trailers must always define the maximum towing vehicle mass	X	
C	Use NSSTA	X	

The meeting agreed to continue to follow B or C until the revised version of R55, which should address this issue, is completed and published.

UK will take to Commission.

**6.13 Directive 2007/46/EC Article 32**  
Publishing information about recalls (UK)

**LEGISLATION**

Article 32 - Recall of vehicles

1. Where a manufacturer who has been granted an EC vehicle type-approval is obliged, in application of the provisions of a regulatory act or of Directive 2001/95/EC, to recall vehicles already sold, registered or put into service because one or more systems, components or separate technical units fitted to the vehicle, whether or not duly approved in accordance with this Directive, presents a serious risk to road safety, public health or environmental protection, he shall immediately inform the approval authority that granted the vehicle approval thereof.

**Discussion:**

At VCA we have realised that, other than the French Authorities, we are the only MS which specifically publishes information about recalls according to Article 32.

We would like to rely on the RAPEX notifications and stop sending separate messages about recall on vehicles with e11 approvals.

**Question:**

How is this handled by other TAAs?

Option	Solution	Accept	Reject
A	Specifically publish information about recalls		
B	Rely on RAPEX notifications		

**The meeting agreed that all delegates should check what their authorities do and report back to next TAAM.**

**6.14 2007/46/EC Annex IX and X**  
CoP measures and CoC (Germany4)

**Issue:**

A vehicle manufacturer informs the TAA about a non-conformity of his product. The deviation to the approval is not posing a risk in traffic safety nor being a severe impact on the environment or on public health. The TAA asks for the immediate proposal by the OEM (of a list) of measures how the production of the vehicle come back to conformity. The TAA sets a timescale for the fulfilment of the measures and re-conformity of the vehicle.

In the KBAs point of view, the following sanctions/measures possible for the TAA to impose:

1. Set the time limit for the measures described by the OEM in his list of action.
2. Stop the placing on the market of the vehicle.
3. Stop the production of the vehicle.
4. Withdraw the approval.
5. Require a recall from manufacturer.

But the question is, which level of stringency is adequate in which phase (in which state)?

Would you see any other measures or are you applying already some other approaches?

The KBA sees the possibility for the manufacturer to issue a CoC during the phase No1. (2.?) still be given.

This question might be also or just for the SG-CoP as firstly met in Helsinki in October.

**References:**

**Directive 2007/46/EC:**

Annex IX and X

**Questions:**

What is the experience of other TAA?

This question may be best discussed in the COP-SG?

Option	Solution	Accept	Reject
<b>A</b>	The described measures are the only ones. There are no additional measures possible. If the answer is refused: Please state the additional measures in your TAA!		
<b>B</b>	Although the product discrepancies to the approved type, the manufacturer is allowed to fill out a CoC. Always in close relationship with the TAA		



Possibilities of solution

Comments

1	<b>A</b>	The described measures are the only ones. There are no additional measures possible.	If the answer is refused: Please state the additional measures in your TAA!
	<b>B</b>	Although the product discrepancies to the approved type, the manufacturer is allowed to fill out a CoC.	Always in close relationship with the TAA

**The meeting agreed that Germany should refer this to the COP sub-group.**

**6.15 (GSR) REG (EC) No. 661/2009 and (EU) No. 1229/2012**  
 UNECE R 17 and R 25 seats and head restraints, 2007/46/EC (Germany 5)

**Issue:**

The Reg. (EU) No. 1229/2012 make changes to the list of single regulatory acts to be fulfilled in a WVTA (Annex IV of 2007/46/EC). It also incorporates the obligatory legislation for the GSR.

Table No. 15A defines the mandatory application for the different vehicle categories in respect to seats, anchorages and head restraints.

Table No. 38A defines the mandatory application for the different vehicle categories in respect to seats and their head restraints.

In table-line 38A it is clearly mentioned by an „X“ that for all vehicle categories UNECE R 25 in mandatory for fulfilling GSR!

While R 17 the mandatory fitment of head restraints possibly limit to some categories M1/N1 and with spec. obligations to M2/M3 (see scope and No.5.4ff of R17), R25 doesn't have this limitation. It seems to be clear that the legislator (EU) was well aware of that approach and mandated head restraints on purpose!

It is also clear that although one TAA may not see head restraints as a mandatory fitment, at least if seats have head restraint (integrated type or not) they have to fulfil the provisions of either R 25 or R 17.

**References:**

**GSR REG 1229/2012 and (EU) No. 661/2009**

New Annex IV of 2007/46/EC as amended by 1229/2012

**Questions:**

Is it mandatory to equip N3 vehicles with head restraints?

Option	Solution	Accept	Reject
<b>A</b>	Yes (As explained in the text)		
<b>B</b>	No, but at least if fitted they have to fulfil R25 or R17 prov. (As explained in the text)		
<b>C</b>	No and no provisions if fitted in N3		

**The discussion generally preferred Option B, but the meeting agreed that Germany should refer this to the Commission for clarification in the legislation.**

**6.16 Directive 97/68/EC**

Engines for mobile machinery (Germany6)  
(TAAM query 20.09.2013 – 5 answers until now)

**Issue:**

Originally the flexibility scheme was introduced to give the manufacturer of equipment enough time for adapting his equipment to the new engine design of a new emission stage.

The directive 97/68/EC, Annex XIII stipulates:

1.1.1. The number of engines placed on the market under the flexibility scheme shall, **in each engine category**, not exceed 20 % of the annual quantity of equipment with engines **in that category** (former text: “**in that engine category**” changed by 2011/88/EU) that is placed on the market by the OEM (calculated as an average of the latest 5 years’ sales on the Union market). Where an OEM has placed equipment on the Union market for less than 5 years, the average shall be calculated based on the period for which the OEM has placed equipment on the Union market.

**References:**

**Directive 97/68/EC, Annex XIII**

**Questions:**

**What is the meaning of “category”?**

Option	Solution	Accept	Reject
<b>A</b>	The engine categories as described in the article 9, specified by the characters (A, B, C, D etc.) - That means that the calculation will be done in dependency of the power category <b>and</b> the emission stage of the directly previous engine design.		<b>X</b>
<b>B</b>	The power category (subset of the engine category) - 19 kW <= P < 37 kW - 37 kW <= P < 75 kW .....etc.... - The calculation will be done only in dependency of the power category. The counting across the emission stages is accepted. That means that not directly previous engine designs or engines using additional exception procedures (e.g. the flexibility scheme or engines in stock) are also counted for a new flexibility scheme. - Because of the ambiguous wording of the directive this approach is accepted by the COM (letter to CEMA).	<b>X</b>	

**There was no consensus reached. The intention of the directive may lead to answer A, but for reasons of a level playing field for the manufacturers due to different approaches by the MS option B needs to be accepted. KBA wish to discuss this issue again before the next emission stage becomes applicable.**

**7.1 Directive 2000/7/EC, Paragraph 2.2.3**  
Speedometers imperial marking (UK)

**LEGISLATION**

**Directive 2000/7/EC**

“2.2.3. where a vehicles is intended for sale in a Member State where imperial distances are used, the speedometer must also be graduated in mph (miles per hour), with subdivisions of 1, 2, 5 or 10 mph. Marked numerical speed value intervals must not exceed 20 mph and must begin at either 10 mph or 20 mph;”

**Question 1:**

Is it acceptable for the imperial marking to be available only via dealer re-set?  
The principal applies to all vehicle types, not just to motorcycles

Option	Possible Solution	Accept	Reject
A	No, the requirement is for analogue speedometers to be dual marked in imperial markets, and it is acceptable with digital speedometers for single display, but it must be switchable by the driver between imperial and metric.  It is not acceptable for the switching to be only available at/by a dealership.	X	
B	Yes, it is acceptable for the switching to be only available at/by a dealership.		X

**The meeting agreed Option A.**

## 8.1 2009/144/EC

Use of upside-down orientation of a tractor drawbar (Germany3)

### Issue:

Directive 2009/144/EC illustrates the tractor drawbar in the side view showing the normal position. Installing the coupling device in the upside-down orientation will lower down the coupling point and therefore the load will be different.

Several questions arose alongside this issue:

Is it necessary to judge and change the scope of the drawbar so that only suitable and approved coupling devices will fit which are tested accordingly?

There may be ground contact of the device in upside-down orientation – this is to be ruled out / assessed!

Misused may be easily happen – how would that be tackled?

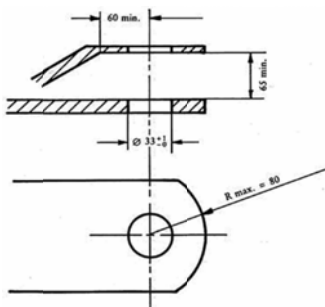
Are there any problems with clearance / tolerances or/and marking?

An approval may be possible if the following provisions are fulfilled:

A.: The marking/ plate has to describe the different vertical loads, to avoid misuse.

If this is not feasible/possible – only the lower value shall be mentioned and the higher value in the case of the “normal” orientation is to be described in the user manual!

B.: The scope of the coupling has to be defined with regard to the upside-down assembly.



.figure: tractor drawbar

### References:

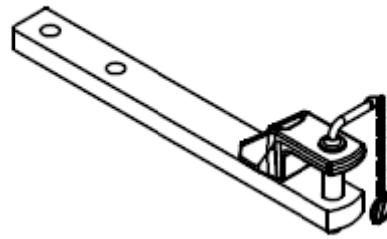
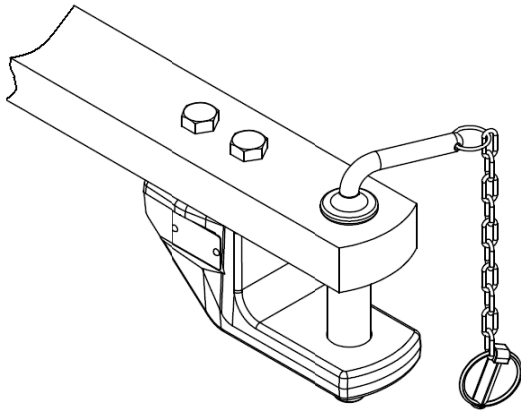
**Directive 2009/144/EC:**

esp. Annex IV

attachment:

Reverse orientation (upside down)

Standard (normal)



May the use of the towing device (tractor drawbar) in upside-down order be possible to be incorporated in the approval? Same D-value but less vertical load!



**Questions:**

Is it possible to include a draw beam in the upside-down orientation in the approval?  
(Same D-value, reduced vertical load due to bolting and less material thickness)

Option	Solution	Accept	Reject
A	Yes, it is possible to include the upside-down position in the approval Make sure that the reduced the vertical load is mentioned	X	
B	No, it's not possible.		X

There were different opinions but the meeting accepted Option A, but it wasn't a favored solution and only acceptable for exceptional cases, if type criteria are fulfilled.

## 8.2 Directive 2009/144/EC

Certain components and characteristics of wheeled agricultural or forestry tractors  
(Switzerland)

### LEGISLATION

#### ANNEX VI – BRAKE CONTROL OF TOWED VEHICLES AND BRAKE COUPLING BETWEEN THE TRACTOR AND TOWED VEHICLES

1. Where a tractor includes a trailer brake control, the control must be either hand or foot-operated, and it must be possible to moderate and operate it from the driver's seat, but it must not be affected by any operation of other controls.

### Discussion

Concerning hydraulic trailer brake control:

There may be a hydraulic connection between the hydraulic steering system and the hydraulic braking system.

In general both systems are supplied from the same energy source (common hydraulic pump)

### **Question:**

Is it allowed that the reaction time of the hydraulic trailer braking system is affected (extended) because the hydraulic steering is active? For example in case of evasive action

Option	Solution	Accept	Reject
A	Hydraulic pump with separate chambers could be necessary.	A and B could be ways of achieving C	
B	Common use of the volumetric flow is admissible.		
C	No it is not allowed for the steering to affect braking	X	

**The meeting agreed that it is not allowed for the braking system to be affected by the activity of the steering system and any solution that achieves this is acceptable.**

## 10.1 Estimation of uncertainty of measurement ISO 17025

### 5.4.6 Estimation of uncertainty of measurement (Germany2)

#### Issue:

TS of category A have to be accredited according to ISO 17025:2005. Where:

The approx. 340 legislative acts may be observed in 3 groups (according the provisions in the legislation):

- a) Tests with qualitative results
- b) Tests with quantitative results and mentioning the Uncertainty (Exactness)
- c) Tests with quantitative results without mentioning the Uncertainty (Exactness)

In (a) and (b) the additional information of the uncertainty is not needed in the test report (62% of the proceedings).

In (c) (38% of the proceedings) the additional view on the Uncertainty is necessary. What are the steps to go? If the band which is stretched out by the measured value leads to an:

- 1) **Uncertainty which is symmetrical to the limit value. Possible test results outside or above the formally allowed limits are accepted**
- 2) **Uncertainty is only on one side of the limits, leading to worst case  possible test results + uncertainty maybe above the limit value leads to test n. OK although the limit value is not reached by the actual test value! (KBA-approach today)**
- 3) **Uncertainty declaration is not necessary**

The TS is not obliged to add the Uncertainty to the test reports.

In our knowledge the OEM and other Industry are preparing their products for fulfilling the approach No, 2.

#### Reference:

ISO 17025:2005

5.4.6 Estimation of uncertainty of measurement

5.4.6.2

.... NOTE 2 In those cases where a well-recognized test method specifies limits to the values of the major sources of uncertainty of measurement and specifies the form of presentation of calculated results, the laboratory is considered to have satisfied this clause by following the test method and reporting instructions (see 5.10).

.....

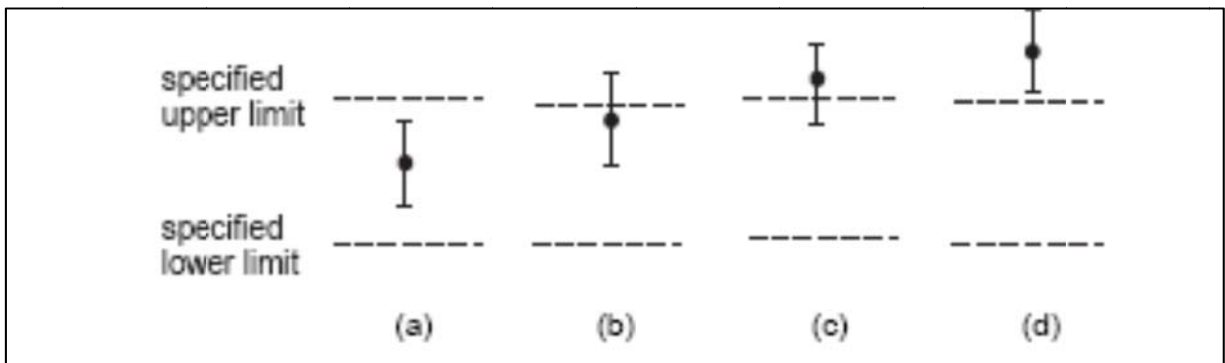
5.10.3.1 In addition to the requirements listed in 5.10.2, test reports shall, where necessary for the interpretation of the test results, include the following:

....

- c) where applicable, a statement on the estimated uncertainty of measurement; information on uncertainty is needed in test reports when it is relevant to the validity or application of the test results, when a customer's instruction so requires, or when the uncertainty affects compliance to a specification limit;



Option	Solution	Accept	Reject
<b>A</b>	Uncertainty which is symmetrical to the limit value Possible test results outside or above the formally allowed limits are accepted	X	
<b>B</b>	Uncertainty is only on one side of the limits, leading to worst case possible test results + uncertainty maybe above the limit value leads to test n. OK although the limit value is not reached by the actual test value! (KBA-approach today)		X
<b>C</b>	Uncertainty declaration is not necessary		X
<b>D</b>	Accept item 'a' and 'b' from the attached Belgian document	X	



The meeting reviewed the Belgian attachment (above) as a better illustration of the issue and agreed that uncertainty should be taken into account for safety and so accepted suggestion 'a', but for TA where safety is not involved, suggestion 'b' is acceptable.

## 10.2 Directive 2007/46/EC, Regulation no. 13

Type approval of trailer; brakes in combinations (CZ1)

### LEGISLATION

#### Discussion

Type approval for trailer which is able to tow another trailer. Point 2.11 of annex I directive 2007/46/EC - there are towable masses given but only for motor vehicle.

Regarding the possibility of combination between towing trailer (not towing vehicle) and another trailer, in Regulation no. 13 there are no requirements for such compatibility.

**Question: Is it possible to issue IWVT approval for such trailer?**

**If yes, where should the manufacturer show the data about maximum mass for another trailer? Is it possible to use the national requirements for brake compatibility for another trailer?**

Option	Possible Solution	Accept	Reject
A	Towed mass should be added into point 2.11 of framework directive.		X
B	Such another trailer will be approved according to the national requirements. Brake compatibility will be considered in the same way.	X	



The wording in 1230/2012 Annex V Part A Item 2.11 was changed from 'motor vehicle' to 'towing vehicle' to allow for this.

The meeting agreed Option B.

### 10.3 Vehicles that have been converted/modified into motor caravans (Ireland)

Question No: NSAI No. 2

Concerning: Motor Caravans

We would like to seek assistance from the other approval authorities with regard to the checks carried out prior to registration, of vehicles that have been converted/modified into motor caravans.

In particular we are interested in an exchange of views concerning:

- The tests/inspections carried out for:
  - seat and table
  - sleeping accommodation
  - cooking facilities
  - storage facilities
  
- Who does these tests/inspections?
  - Nominated/appointed test agency?
  - Consultants?
  - Other?
  
- What documentation (if any) is generated for these vehicles, that is then used for registration?

**Since this question was a late addition to the TAAM meeting in addition to the agenda and did not allow Member States time to consider it before the meeting, the details are attached for delegates to consider.**

**Delegates should respond to Ireland.**

#### 10.4 Access to ETAES (Ireland)

Question No: NSAI No. 1

Concerning: ETAES

NSAI has been asked by our National motor vehicle registration authority for access to ETAES. This is to assist them with issues they encounter during the registration process.

##### Question 1:

Is it possible for the motor vehicle registration authorities in the Member States to be given access to ETAES?

Solutions			Accept	Reject
A	Yes.	ETAES is not solely for type approval. It is also to assist with other functions that depend on type approval, e.g. registration, market surveillance etc.		X
B	No.	ETAES has been set up, and is funded, by the approval authorities and therefore access is strictly for the approval authorities only.	X	
C		Some other solution?		

##### Question 2:

If the answer to Question 1 is A, what is the process to follow to give registration authorities access to ETAES?

**In principle only Type Approval authorities solely should have access, but Ireland should raise this question at the next ETAES meeting again.**

## **10.6 Developments on the revision of the 1958 Agreement and the IWVTA**

TAAM took note of the feedback by the representative of the UN on the development of the revision of the 1958 Agreement and Regulation 0 on the IWVTA. The use of DETA has been approved by WP.29 and is integrated in the draft revision of the Agreement, which enters into force in March 2015. However the extra budget for the hosting of the system by the UN as from mid 2015 has not yet been taken. The technical implementation of the system at UN needs further attention and help if IG-DETA is requested.

## **10.7 Japanese attendance was discussed but insufficient time was available for delegates to respond and/or consult.**

**Decision deferred to next meeting to allow delegates time for consultation and to take a decision in the next meeting of TAAM.**

## **10.8 Next meeting.**

**The next TAAM will be in Lithuania in spring/summer 2014.**

**The following meeting will be in the Czech republic (Prague) in Autumn 2014.**

## Participation list ETAES and TAAM, Geneva 27 – 29 November 2013

Country	Name delegate	ETAES 27 November	TAAM 28 and 29 November
Austria	Franz Wurst	Y	Y
Belgium	Alain Descamps	N	Y
Belgium	Wim Camps	Y	N
Belgium	Patrick de Valck	N	Y
Belgium	Wim Vandenplas	N	Y
Bulgaria	Milena Atanasova	Y	Y
Czech Republic	Lubomír Kincl	N	Y
Czech Republic	Martin Tichý	N	Y
Croatia	Boris Gurup	Y	Y
Croatia	Tonko Županić	Y	Y
Estonia	Jürgo Vahtra	Y	Y
Finland	Harri Tenhunen	N	Y
Finland	Marko Sinerkari	N	Y
France	Marine Molina	N	Y
France	Séverine Guillaume	Y	Y
Germany	Andrea Förster	Y	N
Germany	Frank Wrobel	Y	Y
Germany	Sven Paeslack	Y	Y
Hungary	Erika Németh	N	Y
Iceland	Olafur Arnar Gunnarsson	Y	Y
Iceland	Kristinn Gretarsson	Y	Y
Ireland	Rory Brennan	N	Y

<b>Country</b>	<b>Name delegate</b>	<b>ETAES 27 November</b>	<b>TAAM 28 and 29 November</b>
Ireland	Kieran Hogan	N	Y
Italy	Luca Rocco	N	Y
Latvia	Valdis Blekte	Y	Y
Latvia	Janis Liepins	Y	Y
Latvia	Michael Domanski	N	Y
Latvia	Jerzy W. Kownacki	N	Y
Lithuania	Virginijus Čiškauskas	Y	Y
Luxembourg	Claude Liesch	N	Y
Luxembourg	Romain Lamberty	N	Y
Netherlands	Eddy Dekkers	N	Y
Netherlands	Harry Jongenelen	N	Y
Netherlands	Jan Muns	N	Y
Norway	Erik Sætre	Y	Y
Slovakia	Štefan GAJDOŠ	Y	Y
Slovakia	Lubomír Moravčík	Y	Y
Spain	Lluis Sans	N	Y
Spain	Javier Fadrique	N	Y
Sweden	Tanja Vainionpää	N	Y
Switzerland	Florian Hess	Y	Y
United Kingdom	Mike Protheroe	Y	Y
United Kingdom	Kerry Waine	Y	Y
<b>Total</b>		21	40

TAAM RMI sub-group report

RMI sub-group meeting held on: 25/10/2013

Location: Helsinki

List of attendees:

Ireland	Mr. Rory Brennan (Chair)
Germany	Mr. Frank Wrobel
Finland	Mr. Marko Sinerkari
UK	Mr. Derek Lawlor
NL	Mr. Maarten Balk Mr. Niels den Ouden
Belgium	Mr. Sven Neckebroeck
Estonia	Mr. Jurgo Vahtra
Latvia	Mr. Vladis Blekte Mr. Oskars Vidners Mr. Michal Domanski
Sweden	Mr. Patrick Hammarback

Attachments to this report:

1. OBD and RMI – Background
2. OBD+RMI Summary
3. Oasis document SC2-D5
4. Oasis document SC1-D2
5. EC speech
6. (EC) No 461-2010.pdf
7. EC Guidelines\_to (EC) No 461-2010
8. Commission Mandate to CEN – M/421.

Overview:

The RMI sub-group was created to address specific difficulties highlighted during TAAM concerning RMI.

These difficulties concern the access to vehicle manufacturers' websites for their Vehicle Repair and Maintenance Information.

The EC requirements for RMI are contained within the following EC Regulations:

- (EC) No. 715/2007
- (EC) No. 692/2008
- (EC) No. 566/2011



The following documents were used by the sub-group during its meeting and are attached to this report:

1. OBD and RMI – Background
2. OBD+RMI Summary
3. Oasis document SC2-D5
4. Oasis document SC1-D2
5. EC speech
6. (EC) No 461-2010.pdf
7. Guidelines\_GVO\_c\_13820100528en00160027.pdf

Document 1:

This document describes the specific difficulty with regard to RMI experienced by both NSAI and KBA. At its heart is whether-or-not the EC Regulations mandate vehicle manufacturers' RMI websites to allow for the automatic processing of their RMI information to facilitate the multi-brand IT applications of independent operators.

Document 2:

This document is a summary of the RMI requirements contained within the EC Regulations:

- (EC) No. 715/2007
- (EC) No. 692/2008
- (EC) No. 566/2011

It also considers the speech given by the Commissions' Head of Unit, DG Enterprise and Industry, titled *"The European Commission's recent Automotive Legislation and the future Work programme affecting the European Aftermarket."*

Document 2 concludes with "Conclusions" and "Questions" reached during the RMI sub-group meeting.

Document 3 and 4:

These are the Oasis documents specified by (EC) No. 692/2008, Annex XIV, item 2.1, as the format that vehicle manufacturers' websites shall follow.

Document 5:

This document is the speech given by the Commissions' Head of unit, DG Enterprise and Industry, titled *"The European Commission's recent Automotive Legislation and the future Work programme affecting the European Aftermarket."*

Documents 6 and 7:

These are not type approval documents but they concern access to the EU market in the motor vehicle area. Unfortunately the sub-group did not have the time to consider these documents.

Additional information:

Since the last TAAM (Luxembourg 6&7 June, 2013) the RMI sub-group became aware of a mandate given by the Commission to CEN to develop a set of standards covering the whole area of access to RMI.

This mandate is in response to Recital (18) of 566/2011 and is dated 21/01/2008.

As a result of this mandate CEN have created a number of draft standards dealing with access to vehicle repair and maintenance information systems. These are scheduled for publication 2014/2015.

These standards will replace the OASIS format currently required.

These standards currently exist in a draft format as follows:

- FprEN ISO 18541-1: *Road vehicles - Standardized access to automotive repair and maintenance information (RMI) - Part 1: General information and use case definition (ISO/DIS 18541-1:2012)*
- FprEN ISO 18541-2: *Road vehicles - Standardized access to automotive repair and maintenance information (RMI) - Part 2: Technical requirements (ISO/DIS 18541-2:2012)*
- FprEN ISO 18541-3: *Road vehicles - Standardized access to automotive repair and maintenance information (RMI) - Part 3: Functional user interface requirements (ISO/DIS 18541-3:2012)*
- prEN ISO 18541-4: *Road vehicles - Access to automotive repair and maintenance information (RMI) - Part 4: Conformance test*

### Conclusions:

The following conclusions were reached during the sub-group meeting:

- 1 Manufacturers shall provide unrestricted and standardised access to OBD + RMI in a readily accessible and prompt manner.
- 2 These regulations provide no definitions for the terms “readily accessible” and “prompt manner”. Therefore, in absence of any other requirements, if vehicle manufacturers websites can be accessed through commonly available web browsers that do not require any proprietary tools or software (as per section 2.1 of Annex XIV of 692/2008) these websites comply with the terms “readily accessible” and “prompt manner”.
- 3 Currently, the only required format for the OBD + RMI database is OASIS.
- 4 As the mandate given to CEN to develop a set of standards for OBD+RMI is still ongoing, these standards are not available to vehicle manufacturers and independent operators yet.
- 5 As a minimum, text and graphic formats to be used are those which can be viewed and printed using only standard software plug-ins that are:
  - freely available,
  - easy to install,
  - run under computer operating systems commonly in use.
- 6 Those requiring the right to duplicate or re-publish OBD + RMI should negotiate directly with the vehicle manufacturer concerned. Vehicle manufacturers should be open to this.
- 7 These regulations do not provide any guidance or requirements, for either party, concerning these negotiations. Vehicle manufacturers should be open to this.
- 8 There is no requirement that OBD + RMI must be provided by vehicle manufacturers in such a way that can be automatically processed by independent operators.
- 9 The vehicle manufacturers’ database, at a minimum, shall comprise:
  - The VIN.
  - The OE parts numbers.
  - The OE naming of the parts.
  - The validity attributes (valid-from and valid-to dates).
  - The fitting attributes.
  - Where applicable structuring characteristics.
- 10 The information on the database shall be regularly updated.
- 11 These regulations do not provide a common structured process for the exchange of vehicle component data between vehicle manufacturers and independent operators.

- 12 Regulation 566/2011, Recital 18 provides for the Commission to give to CEN a mandate to develop a common structured approach for the exchange of data between the vehicle manufacturer and independent operators. This has been actioned by the Commission as per its mandate to CEN, dated 21/01/2008, to develop these standards.

The sub-group also expressed its preference for all provisions governing access to vehicle repair and maintenance information for all vehicles to be consolidated within one revised directive as per recital (9) of (EC) No. 715/2007.

Recommendations:

The conclusion reached at the Luxembourg TAAM (6&7 June, 2013) was that TAAM welcomed the suggestion to request the European Commission to invoke Recital 18 of (EC) No. 566/2011 (*see exact TAAM wording below*)

Recommendation 1:

Now that the Commission has given a mandate to CEN, invocation of Recital 18 of 566/2011 is no longer necessary.

Recommendation 2:

TAAM to adopt the conclusions reached by the sub-group.

Recommendation 3:

Further consideration to be given to the draft standards to determine if they will address the current difficulties with access to RMI.

Recommendation 4:

TAAM to decide if the sub-group or TAAM itself is needed to further consider the CEN draft standards.

Recommendation 5:

All provisions governing access to vehicle repair and maintenance information for all vehicles to be consolidated within one revised directive as per recital (9) of (EC) No. 715/2007.

The conclusion reached during the last TAAM was:

**TAAM Minutes:**

TAAM agreed on the need to seek for a solution on the again upcoming difficulties with data access to vehicle OBD and RMI. TAAM welcomed the suggestion to request the European Commission to invoke Recital 18 and to take the lead to organize, in advance of the next TAAM, meetings of the 2 subgroups on COP and RMI in order to find a definite solution on this subject.



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**TAAM Sub-group for  
OBD+RMI Access to Vehicle Repair and Maintenance Systems**

**This document summarises the requirements contained within the following European  
Commission Regulations concerning this topic:**

**(EC) No. 715/2007**

**(EC) No. 692/2008**

**(EC) No. 566/2011**

**For the purpose of assisting the EU Motor Vehicle Approval Authorities in the determination of  
the minimum requirements for vehicle manufacturers with regard to OBD+RMI.**

## Contents

1. Review of Regulation (EC) No. 715/2007.	Page 3.
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3. Review of Annex XIV of Regulation (EC) No. 692/2008.	Page 5.
4. Review of Regulation (EC) No. 566/2011.	Page 6.
5. Review of EC Speech of 24/11/2011.	Page 8.
6. Response to NSAI question 6.13 at Luxembourg TAAM 6&7 June 2013.	Page 9.
7. Conclusions.	Page 10.
8. Questions:	Page 11.

### **1. Regulation (EC) No. 715/2007:**

- Brought in RMI requirements for vehicle manufacturers to provide this information to independent operators. (*Article 6*)
- Recognises that technical specifications for manufacturers' websites are required but does not provide them. (*Recital 8*)
- Initially requires the use of the technical specifications of the OASIS format. (*Recital 8*)
- Asks the Commission to request CEN/ISO to further develop this format into a standard to replace the OASIS format. (*Recital 8*)
- Defines independent operator as:
  - *"Independent operator" means undertakings other than authorised dealers and repairers which are directly or indirectly involved in the repair and maintenance of motor vehicles, in particular repairers, manufacturers or distributors of repair equipment, tools or spare parts, publishers of technical information, automobile clubs, roadside assistance operators, operators offering inspection and testing*

*services, operators offering training for installers, manufacturers and repairers of equipment for alternative fuel vehicles”*

- Requires manufacturers to provide unrestricted and standardised access to RMI through websites using a standardised format in a readily accessible and prompt manner. *(Article 6)*
- Other than the OASIS format, this regulation does not specify any other standard format to be used.
- This regulation does not define the parameters “readily accessible” and “prompt manner”.
- This regulation does not specify vehicle manufacturers’ websites to provide this information in a manner that allows for automatic processing.
- Not later than 4 years after the date of entry into force of 715/2007, Commission is required to review the operation of the system of access to all vehicle repair and maintenance information. *(Recital 9)*
  - This is to decide if it is necessary to consolidate all provisions on access to vehicle repair and maintenance information within a revised framework directive on type approval.
  - If this happens then the corresponding provisions within 715/2007 will be repealed, preserving the existing rights for access to RMI.

Has the Commission carried out this review?

## 2. **Regulation (EC) No. 692/2008:**

- Established requirements to ensure OBD + RMI is readily accessible so as to ensure that independent operators have access to this information *(Recital 6 and Annex XIV)*
- Clarified that the information required for OBD + RMI covered the entire vehicle and not just emissions related components and systems. *(Recital 7)*
- Specifies the following OASIS documents for OBD + RMI *(Annex XIV, section 2.1)*:
  - OASIS Document SC2-D5, Format of Automotive Repair Information, version 1.0, 28 May 2003. **See Attachment Oasis SC2-D5.**
  - OASIS Document SC1-D2, Autorepair Requirements Specification, version 6.1 dated 10.1.2003, sections 3.2, 3.5 (excluding 3.5.2), 3.6, 3.7 and 3.8. **See Attachment Oasis SC1-D2.**
- This regulation does not define the parameters “readily accessible” and “prompt manner”.
- This regulation does not specify vehicle manufacturers’ websites to provide this information in a manner that allows for automatic processing.
- Identified the need to establish a Forum to examine any concerns raised regarding the implementation of section 2.2 of Annex XIV of 692/2008 *(Recital 10 and Article 13(9))*:

- Access to vehicle security features by independent operators.
  - Accreditation and authorisation of independent operators.
  - Independent operators pursue a legitimate business activity.
  - Independent operators have no convictions of relevant criminal activity.
- Recognises that due to the sensitivity of the subject matter it might be necessary to keep discussions and findings of the Forum confidential (*Recital 10*)
  - Approval authorities shall only grant type-approval after receiving a Certificate on Access to Vehicle OBD and Vehicle Repair and Maintenance Information. (*Article 13 (2)*)
  - If the vehicle OBD + RMI is not available or does not conform to Article 6(7) of 715/2007 and Annex XIV when the application for type approval is made, the manufacturer shall provide this information within 6 months of the date of type-approval.
  - Article 14 of 692/2008 “compliance with the obligations regarding access to vehicle repair and maintenance information”
    - This article provides for the checking of manufacturer’s access to OBD + RMI by approval authorities:
      - The check maybe carried out on the initiative of the approval authority or
      - On the basis of a complaint or
      - On the basis of an assessment of a technical service.
    - Where an approval authority finds that the manufacturer has failed to comply with its obligations regarding OBD + RMI, the approval authority which granted the type-approval shall take appropriate steps to remedy the situation.
      - These steps may include withdrawal or suspension of the type-approval, fines or other measures

**3. Annex XIV of 692/2008 Access to vehicle OBD and vehicle repair and maintenance information:**

- Annex XIV lays down the technical requirements for the accessibility of vehicle OBD + RMI.
- Annex XIV does not define the parameters “readily accessible” and “prompt manner”.
- Section 2.1 requires that vehicle OBD + RMI that is available through websites shall follow the technical specification of OASIS Document SC2-D5 and OASIS Document SC1-D2 using only open text and graphic formats *or formats which can be viewed and printed using only standard software plug-ins that are freely available, easy to install, and which run under computer operating systems commonly in use.*
- Section 2.1 also provides for those requiring the right to duplicate or re-publish the OBD and vehicle repair and maintenance information to negotiate directly with the vehicle manufacturer concerned.



- These regulations do not provide any guidance or requirements, for either party, concerning these negotiations.
- Section 2.2 deals with the accreditation and authorisation of the independent operator (does not specify by whom), legitimacy of independent operator etc.
- Remaining sections deal with technical aspects eg, fault codes, reprogramming, information necessary for payment etc.
- Other than the requirement to follow the OASIS Documents SC2-D5 and SC1-D2, there are no further requirements in this Annex with regard to how OBD + RMI should be provided to independent operators.

#### 4. **Regulation (EC) No. 566/2011:**

- Recognises that further clarifications are necessary on the need to provide OBD + RMI to independent operators other than repairers. *(Recital 12)*
- Recognises that currently:
  - There is no common structured process for the exchange of vehicle component data between vehicle manufacturers and independent operators. *(Recital 18)*
  - It is appropriate to develop principles for such an exchange of data. *(Recital 18)*
  - A future common structured process on the standardised format of the data exchanged should be developed by the European Committee for Standardization (CEN) formally. *(Recital 18)*
    - The Commission has given a mandate to CEN (dated 21 January 2008) to develop a set of standards for the provision of standardized access to automotive repair and maintenance information. These standards are in a draft format scheduled for completion in May/September 2014. They are available at the following website:  
<http://www.cen.eu/cen/sectors/technicalcommitteesworkshops/centechinicalcommittees/pages/WP.aspx?param=6282&title=Road%20vehicles>
    - These standards are:
      - FprEN ISO 18541-1: *Road vehicles - Standardized access to automotive repair and maintenance information (RMI) - Part 1: General information and use case definition (ISO/DIS 18541-1:2012)*
      - FprEN ISO 18541-2: *Road vehicles - Standardized access to automotive repair and maintenance information (RMI) - Part 2: Technical requirements (ISO/DIS 18541-2:2012)*

- FprEN ISO 18541-3: *Road vehicles - Standardized access to automotive repair and maintenance information (RMI) - Part 3: Functional user interface requirements (ISO/DIS 18541-3:2012)*
  - prEN ISO 18541-4: *Road vehicles - Access to automotive repair and maintenance information (RMI) - Part 4: Conformance test*
- Adds an additional item to 715/2007, Article 6(2) sub item (j) – standard work units.
  - Adds an additional paragraph to Article 6 paragraph 8 – providing access to independent operators to vehicle repair and maintenance records that are kept in a central data base of a vehicle manufacturer, free of charge and under the same conditions as authorised dealers or repairers.
  - This regulation does not define the parameters “readily accessible” and “prompt manner”.
  - This regulation does not specify vehicle manufacturers’ websites to provide this information in a manner that allows for automatic processing.
  - Amends section 2.1 of Annex XIV of 692/2008 as follows:
    - Requires that information on all parts of the vehicle, with which the vehicle, as identified by the VIN and any additional criteria such as wheelbase, engine output, trim level or options, is equipped by the vehicle manufacturer and which can be replaced by spare parts offered by the vehicle manufacturer to its authorised repairers or dealers or third parties by means of reference to original equipment (OE) parts number, shall be made available in a database easily accessible to independent operators.
    - This database shall comprise:
      - The VIN,
      - The OE parts numbers,
      - The OE naming of the parts,
      - The validity attributes (valid-from and valid-to dates),
      - The fitting attributes
      - Where applicable structuring characteristics.
    - The information on the database shall be regularly updated.

**5. Speech delivered by Head of Unit Automotive Industry, DG Enterprise and Industry, European Commission (dated 24 November 2011):**

- This speech is titled “The European Commission’s recent Automotive Legislation and the future Work programme affecting the European Aftermarket.”
- Is this speech the European Commission’s view on OBD + RMI requirements? Or is this speech the view of the Automotive Industry, DG group?

- This speech considers the area of OBD + RMI as set out within 715/227, 692/2008 and 566/2011. Some of the key points within this speech are:
  - The speech recognises that the legislation as amended still does not require a specific format for exchanging vehicle component information.
  - The speech provides definitions for “database”, “easily accessible” and “using a standardised format”, as follows:
    - *“‘database’ shall mean a collection of independent works, data or other materials arranged in a systematic or methodical way and individually accessible by electronic or other means.”*
    - *“‘Easily accessible to independent operators’ qualifies the access to be granted to the database as not requiring any undue particular effort from the independent operator considering the intended use of the data. Given that the objective for granting access to vehicle component data is their use in IT applications, an “easy access” (to data provided in a database) means at least automatic access with appropriate performance”*
    - *“‘using a standardised format in a readily accessible and prompt manner’: this provision highlights the requirement that the data can be retrieved in a structured format, timely and without delay.”*
  - It notes that the current legislation does not require the vehicle manufacturer to pre-process vehicle component data electronically according to a database structure defined by the independent operator.
  - In the final paragraph it recognises that the Commission services may need to involve itself further if no agreement can be found among the stakeholders on the practicalities of data exchange.
- While it is the opinion of this speech that the legislation mandates the access to vehicle component data to be provided in a way which makes their automatic processing possible, it also acknowledges that this legislation:
  - does not provide a specific format for the exchange of this information,
  - does not require vehicle manufacturers to provide this information in a structure defined by the independent operator,
  - makes no comment on Section 2.1 of Annex XIV of 692/2008 which provides for those requiring the right to duplicate or re-publish OBD+RMI to negotiate directly with the vehicle manufacturer concerned.

6. **Response to NSAI question 6.13 at Luxembourg TAAM 6&7 June 2013**

One response, from the Italian Authority was received and is set out below:

Question 1:

A number of Approval Authorities are experiencing difficulties with this, does TAAM agree there is a problem here?

Each vehicle manufacturer must comply with Type Approval prescriptions, including those concerning the “Repair and Maintenance Information” (RMI). Fiat, as main Vehicle Manufacturer in Italy, complies with prescriptions of Reg. EC 715/2007, Reg. EC 692/2008, Reg. EC 566/2011.

E.g. for Fiat, in specific, Repair and Maintenance Information (RMI) is available to independent operators by means of official web site [www.technicalinformation.fiat.com](http://www.technicalinformation.fiat.com) , in the same way and time of authorized network, in a « readily accessible and prompt manner ».

In detail, Fiat's spare parts catalogue contains the information required by par. 2.1 of Annex XIV to Regulation 692/2008.

The catalogue is available online, at: [www.technicalinformation.fiat.com](http://www.technicalinformation.fiat.com) and the information can be accessed through commonly available web browsers and does not require any proprietary tools or software.

Accordingly, Fiat's technical information is « easily accessible » to independent operators" in the sense of Regulation 692/2008.

The term "easily accessible" means access in a format that allows the electronic processing of the data, this is not supported by the text of the Reg. EC 566/2011 (which amended Regulation 692/2008), it does not use the word "processable" or a synonym.

Nevertheless, Fiat, as other Vehicle Manufacturers, remains open to negotiate with individual interested persons licenses for access to its Repair and Maintenance Information (RMI), which contain all relevant data. The license would include the right to receive an electronic copy of the RMI, the right to publish, to sell it to independent operators, and to collect one or more sections of the Repair and Maintenance Information (RMI) in the same section with other publications of different brands.

Since 2007, for Repair and Maintenance Information (RMI), Fiat did not detect critical issues dealing with « accessibility » or

« standard formats », emerging from the request on the official website or deriving from business to business activities with independent operators, in Italy or Europe.

#### Question 2:

A number of attempts at TAAM have been made to find solutions to OBD and RMI difficulties. Can TAAM provide a solution?

As well explained in Question 1, we do not see particular criticism.

#### Question 3:

Should TAAM now request the Commission to invoke Recital 18 to develop the principles for the exchange of this data?

In order to build good foundations for the implementation of EU legislation, EC issued a Mandate (M/421) inviting CEN to develop a standard or set of standards which specify the requirements to provide 'standardized' access to repair and maintenance information (RMI) for any automotive repair shop.

The work is currently developed in CEN/TC 301 WG 1 'Information for repair and maintenance of vehicles'. These standards will meet the requirements of Reg. EC 715/2007, Reg. EC 692/2008, Reg. EC 566/2011.

Therefore, we do not see the need to activate an additional process in CEN, considering the already existing work at CEN/TC 301 WG 6, already managing standardisation methods on access to technical information.

#### 7. Conclusions:

13 Manufacturers shall provide unrestricted and standardised access to OBD + RMI in a readily accessible and prompt manner. **Agreed.**

14 These regulations provide no definitions for the terms "readily accessible" and "prompt manner". Therefore, in absence of any other requirements, if vehicle manufacturers websites

can be accessed through commonly available web browsers that do not require any proprietary tools or software (as per section 2.1 of Annex XIV of 692/2008) these websites comply with the terms “readily accessible” and “prompt manner”. **Agreed.**

- 15 Currently, the only required format for the OBD + RMI database is OASIS. **Agreed.**
- 16 As the mandate given to CEN to develop a set of standards for OBD+RMI is still ongoing, these standards are not available to vehicle manufacturers and independent operators yet. **Agreed.**
- 17 As a minimum, text and graphic formats to be used are those which can be viewed and printed using only standard software plug-ins that are:
- freely available, **Agreed.**
  - easy to install, **Agreed.**
  - run under computer operating systems commonly in use. **Agreed.**
- 18 Those requiring the right to duplicate or re-publish OBD + RMI should negotiate directly with the vehicle manufacturer concerned. **Agreed. Vehicle manufacturers should be open to this.**
- 19 These regulations do not provide any guidance or requirements, for either party, concerning these negotiations. **Agreed. Vehicle manufacturers should be open to this.**
- 20 There is no requirement that OBD + RMI must be provided by vehicle manufacturers in such a way that can be automatically processed by independent operators. **Agreed.**
- 21 The vehicle manufacturers’ database, at a minimum, shall comprise:
- The VIN. **Agreed.**
  - The OE parts numbers. **Agreed.**
  - The OE naming of the parts. **Agreed.**
  - The validity attributes (valid-from and valid-to dates). **Agreed.**
  - The fitting attributes. **Agreed.**
  - Where applicable structuring characteristics. **Agreed.**
- 22 The information on the database shall be regularly updated. **Agreed. What is meant by “regularly”?**
- 23 These regulations do not provide a common structured process for the exchange of vehicle component data between vehicle manufacturers and independent operators. **Agreed.**
- 24 Regulation 566/2011, Recital 18 provides for the Commission to give to CEN a mandate to develop a common structured approach for the exchange of data between the vehicle manufacturer and independent operators. This has been actioned by the Commission as per its mandate to CEN to develop these standards. **Agreed.**

8. **Questions:**

1. What experiences have other approval authorities in this area? **No experience with complaints.**

2. Has any approval authority any information concerning the review of the OBD+RMI system required by the Commission as per 715/2007 *Recital 9*? **No.**
3. Have any approval authorities developed their own guidelines for vehicle manufacturers to follow with regard to OBD+RMI? **No, will accept the Certificate on Access to Vehicle OBD and Vehicle Repair and Maintenance Information.**

**UK: Have developed guidelines for HGVs. Gave a short presentation on these. They are based on the regulations, following the layout within the regulations. There was a lot of interest in this document from the subgroup. Germany asked if these guidelines are available to the group, UK responded in the affirmative.**

4. Is any approval authority requiring vehicle manufacturers OBD + RMI to be provided in a manner that allows for automatic processing? **No.**
5. Are approval authorities in agreement with the conclusions reached in the conclusions section of this paper? **Yes.**
6. Should the RMI sub-group report be sent to the EC Commission? **Yes but it must first be presented to TAAM, then it can be attached to the TAAM report to the Commission.**
7. Now that CEN is developing a set of standards for OBD+RMI, how should approval authorities proceed with OBD+RMI in the interim period? **Continue "as is". We can review this at the next TAAM. It is important for all to have reviewed the CEN standards before the next TAAM (28/29 Nov 2013) in order to have a fruitful discussion on this.**
8. In order to ensure vehicle manufacturers comply with the standards for OBD+RMI when they are published, will it be necessary for the Commission to make compliance with these standards in an amending regulation to 715/2007? **This whole area needs to be clearer. The group expressed its preference for OBD+RMI to be consolidated within one framework directive covering all categories of vehicles. The time to do this would be when the CEN standards are published (May 2014 / September 2015). This would then present the Commission with the opportunity to mandate the compliance with these CEN standards.**
9. On 11 October 2013 NSAI received a communication from the Commission (Enterprise and Industry Directorate General) requesting a discussion with NSAI to gain a better understanding of NSAI's position with regard to Article 14 of 692/2008 "compliance with the obligations regarding access to vehicle repair and maintenance information". Has any other approval authority received such a communication? **No.**