



**Ministry of Transport**  
Department of Road Vehicles Operation  
Nábřeží Ludvíka Svobody 12  
110 15 Prague 1  
Czech Republic

**TAAM PRAGUE**  
**2014**

# **Type Approval Authorities Meeting**

**06 – 07 November 2014**  
**Prague - Czech Republic**  
**Ministry of Transport**

**MEETING MINUTES**

**MARCH 2015**

# AGENDA

**1. Opening of the Meeting.**

**2. Adoption of the Agenda.**

**3. Adoption of the minutes from Vilnius, Lithuania (spring 2014) Meeting.**

**4. Short ETAES information.**

**5. Follow up on questions from previous meetings:**

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Directive 2007/46/EC, CoC for complete or completed vehicles of category N  
(Sweden 1)
- 5.2. Vilnius item 7.11.  
Directive 2007/46/EC, seating positions for vehicles of the M2, M3 category  
(Lithuania 1)
- 5.3. Vilnius item 7.12.  
Directive 2007/46/EC, Article 32 – Recall of vehicles  
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- 5.4. Vilnius item 8.2.  
Directive 2013/60/EC – CoC for two wheelers  
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- 5.5. Vilnius item 10.2.  
R 48 (05/06 series), Automatic light switching  
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**6. Questions relating to framework Directive 2007/46/EC (motor vehicles):**

- 6.1. Regulation (EC) No. 1230/2012, Annex 1 - Technical Requirements, PART D,  
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(Belgium 1)
- 6.2. Single step approval with regard to masses and dimensions  
(CZ 1)
- 6.3. Self-testing procedure in EC type-approval of small series (Article 22)  
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- 6.4. Numbering of Annex IV and Annex XI items  
(France 2)
- 6.5. Rolling resistance coefficient consistency with Regulation (EC) No. 661/2009  
and 715/2007; 692/2008  
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- 6.6. Winter tyres and rolling resistance coefficient (RRC) in WVTA according to Directive 2007/46/EC and Regulations (EU) No. 458/2011 and (EC) No.692/2008 as from 01.09.2014 (follows up to the Brussels 2012 item 5.28. UK, Luxembourg 2013 item 5.7. UK and Geneva 2013 item 5.6. UK, relating to Regulation (EC) 630/2012) (Germany 1)
- 6.7. Off road vehicles, Annex II, subparagraph 4.3: Symbol G (Netherlands 1)
- 6.8. Choice of tyres for vehicle road load measurement, Regulation (EC) No. 715/2007; Regulation (EC) No. 692/2008; Access to vehicle OBD and vehicle RMI (Netherlands 2)
- 6.9. Technical data in Information document for WVTA´s – Partly access for the industry and public (Norway 1)
- 6.10. Definition of VERSION for M1 (and N1), Different max. power within one Type/Variant/Version (Norway 2)
- 6.11. Suspension for trailers, Annexes I and III (Sweden 2)
- 6.12. Pedestrian protection leg form to bumper impact concession areas. Regulation (EC) No. 78/2009, Annex I, paragraph 3.1, UNECE R127 paragraph 5.1.1. (UK 1)
- 6.13. Multi stage/ Final stage VINs (Ireland 1)
- 6.14. Categorisation of vehicles –Sight seeing trains (Ireland 2)

**7. Questions relating to framework Directive 2002/24/EC and Regulation (EU) No. 168/2013 (motorcycles)**

- 7.1. Regulation (EU) No. 168/2013, article 19: prohibition of defeat devices (Germany 2)
- 7.2. Type designation according to Directive 2002/24/EC and Regulation (EU) No. 168/2013 (Germany 3)

**8. Questions relating to framework Directive 2003/37/EC and Regulation (EU) No. 167/2013 (agricultural and forestry tractors):**

- 8.1. End of series procedure for tractors (Directive 2000/25/EC) (Romania 2)
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**9. Questions relating to UNECE Regulations**

- 9.1. Application of UNECE Regulation No. 66 for granting of whole vehicle type-approval (CZ 2)
- 9.2. Determination of the level of the instrument panel with regard to the ignition key, R 21.01, Annex 10, paragraph 2.4 (Netherlands 3)
- 9.3. Composite material replacement brake discs, R 90, Annex 11, paragraph 2.1. (Netherlands 4)
- 9.4. R 79, Annex 4, paragraph 2.3., Warning signals in case of a failure of the auxiliary steering equipment (ASE) (Netherlands 5)
- 9.5. R 79, paragraph 5.2.1., Ratio between unsteered or articulated steered axles and friction-steered axles (Netherlands 6)
- 9.6. R 48, paragraph 5.15., Colour conspicuity marking at the rear (Netherlands 7)
- 9.7. R 13, paragraph 5.2.1.18. and Annex 10, paragraph 3.1.5.1., Vehicles intended for towing O2 trailers fitted with compressed-air braking systems (Netherlands 8)
- 9.8. R 107, the method of measuring the seat spacing between two consecutive seats facing in the same direction (follows up to the Vilnius item 10.6., France 4) (Romania 1)
- 9.9. R 10.04, Annex 11: Method(s) of testing for emission of harmonics generated on AC power lines from vehicle (Spain)
- 9.10. R 55, Annex 6, item 1, Mechanical coupling components (Sweden 1)

## 10. Miscellaneous

- 10.1. New software developments. What kind of software is used / developed by / for others TAA (Belgium 2)
- 10.2. Market surveillance (Slovakia)
- 10.3. Update on RMI issue (Ireland 1)

## 11. Next TAAM

## 12. Any other business

## MEETING QUESTIONS AND NOTES

### 1. Opening of the Meeting

The delegates were welcomed in the Czech Republic by head of Department of Road Vehicle Operation. The meeting was chaired by [redacted].

### 2. Adoption of the Agenda

The proposed meeting Agenda was accepted as presented with the addition of questions coming from Bulgaria and Ireland.

### 3. Adoption of the minutes from Vilnius (22-23 May 2014) Meeting

The minutes from the previous TAAM meeting held in Vilnius, Lithuania (22-23 May 2014) were adopted with lesser corrections (conclusion of point 7.5., Reg. 1230/2012 – the last sentence in a frame we should read “Although, the meeting made a remark that vehicles higher than 4 meters can have national *small series* or individual type approval.”; conclusion of point 8.2., Directive 2013/60 – *solution A was adopted* )

### 4. Short ETAES information.

Germany (KBA) presented minutes of ETAES.

**5. Follow up on questions from previous meetings:**

**5.1 Vilnius item 7.9. (Sweden 1)  
Directive 2007/46/EC, CoC for complete or completed vehicles of category N**

SUBJECT: Certificate of Conformity for complete or completed vehicles of category N

REGULATION: 2007/46/EC

RELEVANT SECTION: Annex IX, Side 2, points 1. and 1.1.

1. Number of axles: ..... and wheels: .....

1.1. Number and position of axles with twin wheels: .....

**QUESTION:**

How should the number of wheels be filled in? This issue was a question from RDW at TAAM in Riga in 2011.

The solutions suggested from the RDW were:

One interpretation is that a twin wheel shall be counted as one wheel. The entries on the CoC, in case of for example a vehicle with one front axle with single wheels and one rear-axle with twin wheels shall then be:

1. Number of axles: .....2..... and wheels: .....4.....

1.1. Number and position of axles with twin wheels: .....1/2.....

The other interpretation is that a twin wheel is counted as two wheels. The entries on the CoC shall then be:

1. Number of axles: .....2..... and wheels: .....6.....

1.1. Number and position of axles with twin wheels: .....1/2.....

According to the report the solution *twin wheels shall be counted as two wheels* was accepted. It seems

though that the manufacturers still fill in this differently. This gives a problem when the vehicles are registered.

Has the point of view changed or is TAAM still of the meaning that a twin wheel shall be counted as two wheels.

A	Twin wheels shall be counted as one wheel	
B	Twin wheels shall be counted as two wheels	

There was a long discussion about this question, finished off with a round table comments. TAAM delegates agreed with solution B (twin wheels shall be counted as two wheels) but with recommendation of certain degree of flexibility.

**5.2 Vilnius item 7.11.**

**(Lithuania 1)**

**Directive 2007/46/EC, seating positions for vehicles of the M2, M3 category**

Legislation:

**Definition on the Directive 74/408/EEC:**

2.5. ‘Seat’ means a structure likely to be anchored to the vehicle structure, including its trim and attachment fittings, intended to be used in a vehicle and to seat one or more adult persons.

Depending on its orientation, a seat is defined as follows:

2.5.1. ‘Forward-facing seat’ means a seat which can be used whilst the vehicle is in motion and which faces towards the front of the vehicle in such a manner that the vertical plane of symmetry of the seat forms an angle of less than + 10° or - 10° with the vertical plane of symmetry of the vehicle;

2.5.2. ‘Rearward-facing seat’ means a seat which can be used whilst the vehicle is in motion and which faces towards the rear of the vehicle in such a manner that the vertical plane of symmetry of the seat forms an angle of less than + 10° or - 10° with the vertical plane of symmetry of the vehicle;

2.5.3. ‘Side-facing seat’ means a seat which, with regard to its alignment with the vertical plane of symmetry of the vehicle, does not meet either of the definitions given in 2.5.1 or 2.5.2 above;

**Definition on the UNECE regulation No. 80:**

2.5. ‘Seat’ means a structure likely to be anchored to the vehicle structure, including its trim and attachment fittings, intended to be used in a vehicle, and to seat one or more adult persons.

Depending on its orientation, a seat is defined as follows:

2.5.1. ‘Forward-facing seat’ means a seat which can be used while the vehicle is in motion and which faces towards the front of the vehicle in such a manner that the vertical plane of symmetry of

the seat forms an angle of less than + 10° or – 10° with the vertical plane of symmetry of the vehicle.

2.5.2. ‘Rearward-facing seat’ means a seat which can be used while the vehicle is in motion and which faces towards the rear of the vehicle in such a manner that the vertical plane of symmetry of

the seat forms an angle of less than + 10° or – 10° with the vertical plane of symmetry of the vehicle.

2.5.3. ‘Side-facing seat’ means a seat which can be used whilst the vehicle is in motion and which faces towards the side of the vehicle in such a manner that the vertical plane of symmetry of the seat forms an angle of 90° (± 10°) with the vertical plane of symmetry of the vehicle;

Question: Is the folding seats counted specifying number of seating positions?

Possibilities of solution

Comments

A	Yes	All “seats” should be included in the main seats number
B	No	Folding seats should not be counted as “seats”

C	Other	
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The meeting agreed on solution A. All “seats” should be included in the main seats number.

**5.3. Vilnius item 7.12. (France 1)**  
**Directive 2007/46/EC, Article 32 – Recall of vehicles**

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.

2. The manufacturer shall propose to the approval authority a set of appropriate remedies to neutralise the risk referred to in paragraph 1. **The approval authority shall communicate the proposed measures to the authorities of the other Member States without delay.** The competent authorities shall ensure that the measures are effectively implemented in their respective territories.

DISCUSSION

French TAA has difficulties to transmit recalls on vehicles to the other Member States according to Article 32, because the contact list is not up to date.

QUESTION :

Can each TAA communicate the contact person for recall of vehicles, according to Article 32?

Option	Solution	Accept	Reject
1	Establish an updated list of contacts	X	

It was dealt at ETAES meeting. There is a list in Excel format that is posted on ETAES and Member States may modify the contact information.



**5.4. Vilnius item 8.2. (Germany 4)  
Regulation (EU) No. 2013/60 – CoC for two wheelers**

**Issue:**

The above mentioned Regulation is introducing amongst other changes new emission levels for vehicles of category L1e, L2e and L6e.

Do manufacturers have to change CoCs for those types which do not fall under the provisions of Reg (EU) No.2013/60/EU according to point 46 of the CoC (see Annex II, 1(a))? The changes apply only for new types!

Changes are for example:

The description of Euro Levels (1, 2, 3) is mentioned in 46.1, 46.2, 46.3

Recital (6) of reg (EU) No. 2013/60/EU says:

*„Certificates of Conformity for vehicles with an emission approval in accordance with previous provisions should continue to be allowed to indicate the Euro level on a voluntary basis“.*

This recital stipulates the use of the former CoC template should be allowed.

There is a sentence which may be in contradiction with this:

Article (4),2 of Reg (EU) No. 2013/60/EU:

*„With effect from 1 July 2014 Certificates of Conformity shall be issued for vehicles complying with the provisions of directive 97/24/EC as amended by point 1 of Annex II to this directive“.*

Therefore also existing types may have to be delivered with the new CoC although not approved under the new provisions. (that means with EURO levels).

**References:**

**Regulation (EU) 2013/60 Recital (6) and Art.4 :**

**Questions:**

Would you (your MS registration authority) reject an CoC based on the obligations prior to the changes of Reg (EU) No. 2013/?

**Possibilities of solution Comments**

1	A	The CoC based on the previous provisions is valid for vehicles not being approved under Reg (EU) No. 2013/60	
	B	The new CoC apply for all vehicles after the 1st of July 2014.	

The meeting agreed on solution A. The CoC based on the previous provisions is valid for vehicles not being approved under Regulation (EU) No. 2013/60 .

## 5.5 Vilnius item 10.2. (Germany 5)

### R 48 (05/06 series), Automatic light switching

#### 1. Interpretation (KBA view)

Until UN R48 04 series the electrical switching provisions have been described without detailed numbering under point 6.2.7.

#### 6.2.7. *Electrical connections*

The control for changing over to the dipped-beam must switch off all main-beam headlamps simultaneously.

The dipped-beam may remain switched on at the same time as the main beams.

In the case of dipped-beam headlamps according to Regulation No 98, the gas-discharge light sources shall remain switched on during the main-beam operation.

One additional light source, located inside the dipped-beam headlamps or in a lamp (except the main-beam headlamp) grouped or reciprocally incorporated with the respective dipped-beam headlamps, may be activated to produce bend lighting, provided that the horizontal radius of curvature of the trajectory of the centre of gravity of the vehicle is 500 m or less.

This may be demonstrated by the manufacturer by calculation or by other means accepted by the authority responsible for type approval.

**Dipped-beam headlamps may be switched ON or OFF automatically. However, it shall be always possible to switch these dipped-beam headlamps ON and OFF manually.**

The last entry (in bold) is since 05 series now No.6.2.7.5 which applies still without restrictions for vehicles without DRL.

The new provision 6.2.7.6 entering into force with the 05 series restricts the application of 6.2.7.5 if DRL is installed (see justification to 6.2.7.6, last sentence: „*but they must not interfere with the requirements for daynight automatic switching*“). The 05 series have been amended especially in the light of clarifying the automatic switching functions. The justification to paragraph 6.2.7.6 – to be applied when DRL is installed in the vehicle – is the main reason for the changes in 05 series. The Prop. Supplement 5 to 04; GRE/2009/34 (see Annex) explains the mandatory provisions of the automatic switching of the dipped-beam for specific ambient conditions (see Annex 13) after a transitional period. This automatic switching shall provide the activation of the dipped-beam during night or other similar unsighted conditions (mist, severe rain..)!

Paragraph 6.2.7.5 is giving the manufacturer the possibility to install switching logics in his vehicle which allow under specific temporary conditions (<10kph...) to switch off manually the driving-beam/dipped-beam (see also justification GRE/2009/34 to Paragraph 6.19.7.2) This switching provision was discussed during the TAAM 2013 in Luxemburg (Agenda item 9.2). It was the agreed understanding of the TAAM group, that e.g. during the stand-still in front of a railway barrier or during the check/control by a police officer the driving beam need to be switched off manually. The switching provisions for the DRL in 6.2.19 are showing the intended use in temporary situations. (last sentence in a.m. justification).

The primary intended approach of these provisions shall be, that the often seen wrong illumination/lighting of the vehicles – DRL during the night time, especially missing position

and lamps and rear lighting and glare to approaching vehicles – will be solved by automatic switching functions! Miss-switching by the driver shall be made impossible. Often the driver may not recognize during the night that he is driving with DRL on only - means the lighting described in 5.11 are also not on! (Position, rear lamps...) This phenomenon is supported by the today's illumination of the instrument lights during day-time conditions.

For a transitional period of 66 months, Interim-switching conditions are accepted (see 6.2.7.6.2-3), which allow specific combinations of lamps ( position-lamps and DRL...) After this period the above explained automatic switching function is mandatory!

**2. Interpretation**

Point 6.2.7.5 is always to be realized by the manufacturer and seen as an ultimate provision which always allows to switch off the dipped-beam manually! This may lead to a situation where at night the 5.11 lights and dipped-beam is off and DRL is on!!

**References:**

UN R48 05 an 06 series and GRE/2009/34 with justifications of 05 series (former proposed as suppl.5 to 04 series..)

**Questions:**

Will the TAAM follow the above mentioned interpretation 1. or follow instead the understanding No. 2?

**Possibilities of solution**

**Comments**

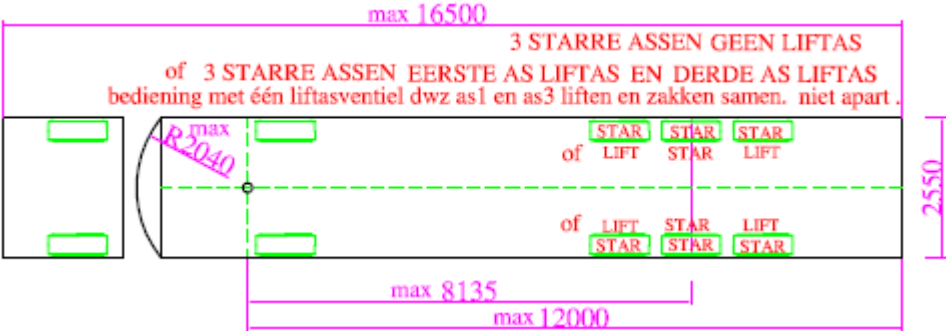
1	A	The provision 6.2.7.6 as the main reason for the amendments of 05 series clarifies the electrical switching provisions which as a consequence overrules 6.2.7.5 when DRL is installed	Provisions 6.2.7.6 is the newer provisions which clarifies the automatic switching provisions and 6.2.7.5 may only apply under circumstances described in 6.19.7.2. (see also TAAM Lux 9.2)
	B	Provision 6.2.7.5 always applies and therefore switching off the dipped beam e.g. at night could happen with activation of DRL at the same time. Provision 6.2.7.5 is therefore seen as an ultimate provision.	Provision 6.2.7.5 is written in a way that an interpretation may arise that it is in contradiction with 6.2.7.6 result in contrary legislation

TAAM was still agreeing with conclusion of TAAM in Vilnius, so both answer A and B are acceptable.  
 This point can be discussed again on next meeting with regard to progress of GRE opinion.

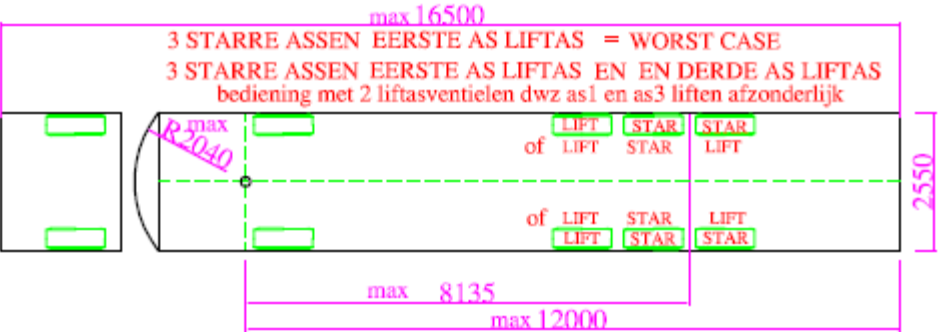
**6. Questions relating to framework Directive 2007/46/EC (motor vehicles):**

**6.1. Regulation (EC) No. 1230/2012, Annex 1 - Technical Requirements, PART D, Vehicles of category O, 3. Maneuverability requirements (Belgium 1)**

According to the requirements as stated in Reference here above a standard three axle configuration has a wheelbase of 8135mm as you can see on picture here below. Picture 1.



According to the requirements as stated in Reference here above; “Where one or more of the non-steering axles has an axle lift device the reference wheelbase with the axle lowered or the axle lifted — whichever is the longest — shall be taken into account”, a 3-axle trailer with lifting device on the first axle should be configured as picture here below. Otherwise if the configuration in picture 1 would be foreseen of a first axle with lifting device, the theoretical wheelbase would be: 8455As you can see, all three axles have been moved forward to be able to fulfill the requirements of the 1230/2012 Annex 1 Part D 3.2 Picture 2



Some manufactures lose business weekly because in other countries a 3 axle configuration with lifting device on the first axle and a wheelbase as drawn is picture 1 here above is allowed. Although this configuration is not compliant to the 1230/2012 Annex 1 Part D 3 manoeuvrability requirements. 3 axles moved to the rear have a better partition of the laden mass. The market prefers such configuration. As Belgium does not allow this configuration, the Belgian clients go abroad to

purchase vehicles in a configuration which is not allowed in Belgium but seems to be allowed in another member state.

Question:

Allowed?

Not allowed?



TAAM Minutes:

The majority of states were in favour of the answer that this configuration is not allowed.

Directive or Regulation
97/27/EC (EU) 1230/2012 (EC) 661/2009 2007/46/EC
Legislation basis
<p><u>Requirements of Directive 97/27/EC</u></p> <p>7.4.2.5. When the vehicle is laden to its mass <math>M</math> according to <b>any one of the relevant situations described in sections 7.4.2.5.1 or 7.4.2.5.2</b> the mass corresponding to the load on the axle 'i' must not exceed the mass <math>M_i</math> on that axle, and the mass corresponding to the load on the solo axle or group of axles 'j' must not exceed the mass <math>\mu_j</math>.</p> <p>7.4.2.5.1. Uniform distribution of mass means the vehicle in running order with a mass of 75 kg positioned on every passenger seat is laden to its mass <math>M</math>, the payload being uniformly distributed on the area designed for the transportation of goods.</p> <p>7.4.2.5.2. In the case of extreme distribution of mass (non-uniform load), the manufacturer must state the extreme permissible possible positions of the centre of gravity of the payload and/or body and/or equipment or interior fittings (for instance: from 0,50 m to 1,30 m in front of the first rear axle), with the vehicle in running order and a mass of 75 kg positioned on every passenger seat being laden to its mass <math>M</math>.</p> <p><u>Requirements of Regulation (EU) 1230/2012</u></p> <p>2.3. Specific requirements</p> <p>2.3.1. The mass of the vehicle in running order, plus the mass of the optional equipment plus the mass of the passengers, plus the mass of the coupling if not included in the mass in running order plus the technically permissible maximum mass at the coupling point shall not exceed the technically permissible maximum laden mass of the vehicle.</p> <p>2.3.2. Where the vehicle is laden to its technically permissible maximum laden mass, the mass distributed on an axle 'i' shall not exceed the mass <math>m_i</math> on that axle, and the mass on the group of axles 'j' shall not exceed the mass <math>\mu_j</math>.</p> <p>2.3.3. The requirements of point 2.3.2 shall be complied with in the following load configurations:</p> <p>2.3.3.1. Uniform distribution of the pay-mass: the vehicle shall be at its mass in running order plus the mass of the optional equipment plus the mass of the passengers located at the seating reference points, plus the mass of the coupling (if not included in the mass in running order), plus the maximum permissible mass at the coupling point, plus the pay-mass being distributed uniformly on the cargo area.</p> <p>2.3.3.2. Non-uniform distribution of pay-mass: the vehicle shall be at its mass in running order plus the mass of the optional equipment plus the mass of the passengers located at the seating reference points, plus the mass of the coupling (if not included in the mass in running order), plus the maximum permissible mass at the coupling point, plus the pay-mass located in accordance with the manufacturers specifications.</p> <p>For such purposes the manufacturer shall state the extreme permissible possible positions of the centre of gravity of the pay-mass and/or body and/or equipment or interior fittings (for instance: from 0,50 m to 1,30 m in front of the first rear axle).</p> <p><b>2.3.3.3. Combination of uniform and non-uniform distribution:</b> <b>The requirements of points 2.3.3.1 and 2.3.3.2 shall be fulfilled simultaneously.</b></p>

Regulation (EU) 1230/2012, Article 7, Transitional provisions

1. National authorities shall permit the sale and entry into service of vehicles type-approved before the date referred to in Article 13(2) of Regulation (EC) No 661/2009 and shall continue to grant extensions to approvals granted under the terms of Directive 92/21/EEC and Directive 97/27/EC.

Regulation (EC) 661/2009, Article 13

2. With effect from 1 November 2012, national authorities shall refuse to grant on grounds relating to the areas of vehicle safety and tyres covered by Articles 5 to 8, Article 9(2) and Article 11:

(a) EC type-approval or national type-approval in respect of new types of vehicle of the categories specified in those Articles and their implementing measures, where such vehicles do not comply with this Regulation and its implementing measures...

Regulation (EC) 661/2009, Article 19, Repeal

1. Directives 70/221/EEC, 70/222/EEC, 70/311/EEC, 70/387/EEC, 70/388/EEC, 71/320/EEC, 72/245/EEC, 74/60/EEC, 74/61/EEC, 74/297/EEC, 74/408/EEC, 74/483/EEC, 75/443/EEC, 76/114/EEC, 76/115/EEC, 76/756/EEC, 76/757/EEC, 76/758/EEC, 76/759/EEC, 76/760/EEC, 76/761/EEC, 76/762/EEC, 77/389/EEC, 77/538/EEC, 77/539/EEC, 77/540/EEC, 77/541/EEC, 77/649/EEC, 78/316/EEC, 78/317/EEC, 78/318/EEC, 78/549/EEC, 78/932/EEC, 89/297/EEC, 91/226/EEC, 92/21/EEC, 92/22/EEC, 92/24/EEC, 92/114/EEC, 94/20/EC, 95/28/EC, 96/27/EC, 96/79/EC, **97/27/EC**, 98/91/EC, 2000/40/EC, 2001/56/EC, 2001/85/EC, 2003/97/EC shall be repealed with effect from 1 November 2014.

**Issue**

Most of the producers of the basic vehicles of categories N still apply approvals according to Directive 97/27/EC. They fulfil requirements of paragraphs 7.4.2.5.1. and 7.4.2.5.2. but they are not obliged to comply with this requirements simultaneously.

However when issuing whole vehicle type-approval in second stage based on such a vehicle there occur several problems if new Regulation (EU) 1230/2012 should have been applied, above all the above mentioned paragraph 2.3.3.3.

For the manufacturer of the superstructure this would mean that there exists only one possible position of the centre of gravity both for uniform and non-uniform load as long as the first stage manufacturer declares the maximum technically permissible laden mass as the exact sum of the maximum technically permissible laden mass on the axles. This case occurs for most of the manufacturers in the first stage.

This leads to more general questions regarding the issuing of single step whole vehicle type-approval extensions where the manufacturer was granted basic WVTA prior 1.11.2012 and the technical report proving compliance for “masses and dimensions” was issued according to the Directive 97/27/EC. As the Directive ceases to be valid from 1.11.2014 there occurs a question regarding the validity and extendibility of technical reports issued for the purpose of granting WVTA extension.

**Questions:**

- 1) Is it possible for single step second stage whole vehicle type-approval to apply the same regulatory act for masses and dimensions which was applied for the approval of the base vehicle?
- 2) When issuing extension of whole vehicle type-approval where no partial approval according

to Directive 97/27/EC exists but technical report according to the Directive was issued is it possible to extend such approval still applying the Directive?			
Possible solutions:			
		Solution	Comment
1	A	YES, it is possible to apply the same regulatory act (i.e. Directive 97/27/EC) for the second stage vehicle as long as the base vehicle applies this regulatory act on the base of Regulation (EU) 1230/2012, Article 7	As the basic vehicle applies requirements of the Directive 97/27/EC it is practically impossible for the manufacturer of the second stage to conform with the requirements of the Regulation (EU) 1230/2012 and as the data given by the manufacturer of the base vehicle are in the form required by the Directive, this Directive still may be applied
	B	NO, for new whole vehicle type-approval regardless its stage only Regulation (EU) 1230/2012 shall apply	Directive 97/27/EC is no longer valid for issuing new approvals. Nevertheless the problems with the application of the different requirements only the new Regulation must be applied.
2	A	YES, for extension of single step whole vehicle type-approval Directive 97/27/EC still applies	As the basic whole vehicle type-approval was issued within the validity of Directive 97/27/EC and the vehicle was type-approved <b>under the terms</b> of this Directive, this is exactly the case referred to in Regulation (EU) 1230/2012, Article 7, paragraph 1
	B	NO, for extension of single step whole vehicle type-approval only Regulation (EU) 1230/2012 shall apply	As no separate type-approval according to the Directive 97/27/EC exists this situation is not described in Regulation (EU) 1230/2012, Article 7, paragraph 1, therefore only applicable regulatory act is Regulation (EU) 1230/2012

The meeting agreed on solution 1A - it is possible to apply the same regulatory act (i.e. Directive 97/27/EC) for the second stage vehicle as long as the base vehicle applies this regulatory act on the base of Regulation (EU) 1230/2012, Article 7.

For question 2 is solution 2A - for extension of single step whole vehicle type-approval Directive 97/27/EC still applies.



### 6.3. Self-testing procedure in EC type-approval of small series (Article 22) (France 1)

#### ISSUE :

It is not clear whether or not the self-testing procedure (where manufacturer is designated as technical service) can be applied in the case of EC type-approval of small series (Article 22).

Indeed, it seems that there is a mismatch between EC Directive 2007/46, Annex IV, Appendix I, footnote A, and EC Directive 2007/46, Annex XV, paragraph 0.3.

#### REFERENCES :

##### SELF-TESTING :

- EC Directive 2007/46, Chapter XVI, Article 41, paragraph 6 :

« 6. A manufacturer or a subcontracting party acting on his behalf may be designated as a technical service for category A activities with regard to the regulatory acts listed in Annex XV.»

- EC Directive 2007/46, Annex XV , paragraph 0.3 :

« 0.3. However **it does not apply to manufacturers which apply for small series approval in accordance with Article 22.**»

#### EC TYPE-APPROVAL of SMALL SERIES :

- EC Directive 2007/46, Annex IV, Appendix 1, Footnote A

Explanation of Footnote A in the table:

« Application of the regulatory act as follows:

(c) tests and checks shall be conducted by the technical service **or the manufacturer under the conditions laid down in Articles 41, 42 and 43.** »

#### QUESTION:

Is Self-testing procedure allowed in EC type-approval of small series (Article 22)?

#### ANSWERS :

Answer A	Yes, the self-testing procedure is allowed in EC Type approval of small series, therefore Annex XV must be amended.
Answer B	No, the self-testing procedure is not allowed in EC type-approval of small series, as per Annex XV.

This is very problematic question and many points of view exist, but solution A is most frequent answer - the self-testing procedure is allowed in EC type approval of small series. Therefore Annex XV should be amended.

## 6.4. Numbering of Annex IV and Annex XI items

(France 2)

### ISSUE:

EC Regulation 661/2009, Annex III requests that the items regarding repealed directives must be removed from the tables of Annexes IV and XI (items 3 to 10, 12 to 38, 42 to 45, and 47 to 57), from 1st of November 2014.

Still, it is allowed to grant extensions for some of those repealed directives. (See document: Validity and extension of approvals granted under the Directives repealed by Regulation (EC) No 661/2009).

### PROPOSAL:

For the sake of clarity, France wishes that the items regarding repealed directives for which an extension is allowed can be kept in the tables of Annexes IV and XI (and associated appendix), as long as extensions to those directives are permitted. A footnote can be added to precise that only extensions to existing EC type approvals are allowed.

#### Example:

Instead of deleting item 10:

10	<del>Radio interference (electromagnetic compatibility)</del>	<del>Directive 72/245/EEC</del>
10A	Electromagnetic compatibility	Regulation (EC) No 661/2009 UNECE Regulation No 10

Keeping item 10 with a footnote :

10	Radio interference (electromagnetic compatibility)	Directive 72/245/EEC*
10A	Electromagnetic compatibility	Regulation (EC) No 661/2009 UNECE Regulation No 10

\* : only extensions to existing EC type approvals

### REFERENCES :

EC Regulation 661/2009, Annex III, points 1.a.i, 1.b.i :

« 1. Part I of Annex IV shall be amended as follows:

(a) the table shall be amended as follows:

(i) points 3 to 10, 12 to 38, 42 to 45 and 47 to 57 shall be deleted; »

[...]

(b) the Appendix shall be amended as follows:

(i) points 3 to 10, 12 to 37, 44, 45 and 50 to 54 of the table shall be deleted; »

EC Regulation 661/2009, Annex III, points 3.a.i, 3.b.i, 3.c.i, 3.d.i, 3.e.i :

« 3. Annex XI shall be amended as follows:

(a) in Appendix 1, the table shall be amended as follows:

(i) points 3 to 10, 12 to 38, 44, 45 and 47 to 54 shall be deleted;

[...]

(b) in Appendix 2, the table shall be amended as follows:

(i) points 3 to 10, 12 to 38, 42 to 45 and 47 to 57 shall be deleted;

[...]

(c) in Appendix 3, the table shall be amended as follows:

(i) points 3 to 10, 12 to 37, 44, 45 and 50 to 54 shall be deleted;

[...]

(d) in Appendix 4, the table shall be amended as follows:

(i) points 3 to 10, 13 to 36, 42 to 45 and 47 to 57 shall be deleted;

[...]

(e) in Appendix 5, the table shall be amended as follows:

(i) points 3 to 10, 12 to 36, 42 to 45 and 47 to 57 shall be deleted; »

EC Regulation 661/2009, Article 20 :

« Points 1(a)(i), 1(b)(i), 2(a), 3(a)(i), 3(b)(i), 3(c)(i), 3(d)(i), 3(e)(i) and 3(f)(ii) of Annex III shall apply from 1 November 2014. »

QUESTION:

Do you support that items regarding repealed directives for which an extension is allowed should be kept in the tables of Annexes IV and XI (and associated appendix), as long as extensions to those directives are permitted ?

Answer A	Yes
Answer B	No

The meeting supported the solution A.

**6.5. Rolling resistance coefficient consistency with Regulation (EC) No. 661/2009 and 715/2007; 692/2008** (France 3)

ISSUE :

Regulation (EC) 661/2009 defines some maximum values for the rolling resistance coefficient for each tyre type, measured in accordance with ISO 28580.

Rolling resistance coefficient impacts the CO2 emissions which are determined in accordance with EC Regulations 715/2007 and 692/2008.

The consistency of information on the rolling resistance coefficient, must be verified in WVTA.

REFERENCES :

EC Directive 2007/46, Annex IV :

46A	Installation of tyres	Regulation (EC) No 661/2009 Regulation (EU) No 458/2011
46B	Pneumatic tyres for motor vehicles and their trailers (Class C1)	Regulation (EC) No 661/2009 UNECE Regulation No 30
46C	Pneumatic tyres for commercial vehicles And their trailers (Classes C2 and C3)	Regulation (EC) No 661/2009 UNECE Regulation No 54
47D	Tyre rolling sound emissions, adhesion on wet surfaces and rolling resistance (Classes C1, C2 and C3)	Regulation (EC) No 661/2009 UNECE Regulation No 117

EC Directive 2007/46 (EC), Annex I et Annex III and Regulation 692/2008 linked to Regulation 458/2011

The following information must be supplied :

“6.6.1. Tyre/wheel combination(s) (r

(a) for tyres indicate;

— size designation(s),

— load-capacity index (3),

— speed category symbol (3),

— rolling resistance coefficient (measured in accordance with ISO 28580);

(b) for wheels indicate rim size(s) and off-set(s)”

EC Directive 2007/46, Annex VIII

‘In each case, the information must make clear to which variant and version it is applicable. One version may not have more than one result.

However, a combination of several results per version indicating the worst case is permissible. In the latter case, a note shall state that for items marked (\*) only worst case results are given.’

QUESTION 1:

In order to harmonize procedures about rolling resistance coefficient, do you agree that R30, R117 and R54 justifications may be included in EC Type approval according to Regulation 458/2011 (EC)?

ANSWERS :

Answer A	Yes, R30, R117 and R54 justifications can be included in EC Type approval according to Regulation 458/2011 (EC).
Answer B	No, EC Types approvals regarding each of the Regulation must be provided independently

QUESTION 2:

Background :

WVTA must enclose all needed information that permit to ensure the consistency of the rolling resistance coefficient and CO2 emissions for each TVV according to EC Directive 2007/46, Annex 8. Therefore 6.6.1 information must be supplied in WVTA, in EC type approval 458/2011 and in EC type approval 715/2007, so that the X-check can be done:

For instance:

	Rolling resistance coefficient values:	
Regulation 117	9 kg/ton	12 kg/ton
692/2008 - 715/2007	10,5 kg/ton	10,5 kg/ton
458/2011	9 kg/ton	12 kg/ton
WVTA	10,5 kg/ton	10,5 kg/ton
X-check decision	OK	Not OK

Do you agree that 6.6.1 information should be provided in WVTA, in EC type approval 458/2011 and in EC type approval 715/2007, so that consistency could be checked?

ANSWERS :

Answer A	Yes
Answer B	No.

QUESTION 3:

If the answer to question 2 is no, how do you ensure the consistency of the rolling resistance coefficient and CO2 emission value ?

Long discussion took place. There was no chance to find out clear solution. This question will be moved to next TAAM in Iceland because especially question 2 is problematic. Question 1 is A by the opinion of TAAM, but then there is conflict with question B.

- 6.6. Winter tyres and rolling resistance coefficient (RRC) in WVTA according to Directive 2007/46/EC and Regulations (EU) No. 458/2011 and (EC) No.692/2008 as from 01.09.2014 (follows up to the Brussels 2012 item 5.28. UK, Luxembourg 2013 item 5.7. UK and Geneva 2013 item 5.6. UK, relating to Regulation (EC) 630/2012) (Germany 1)

**Reference: TAAM minutes**

Geneva 2013, 5.6 follow up of Luxembourg 2013 5.7, Brussels 2012, 5.28

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

**6.17. Luxembourg 2013**

Upon the request from Germany on the choice of tyres used for type approval according EC Regulation 682/2008, TAAM agreed on the need that also the rolling resistance coefficients of winter tyres, M+S tyres and snow tyres have to be taken into consideration if such tyres are allowed to be fitted on the vehicle type (solution A).

**Definitions:**

*2007/46/EC, article 37: Information intended for users*

1. The manufacturer may not supply any technical information related to the particulars provided for in this Directive or in the regulatory acts listed in Annex IV which diverges from the particulars approved by the approval authority.

**Issue:**

Some vehicle manufacturer wants to ad special winter tyres under ‘Remarks’ of the COC. These tyres are stated explicitly under the tyre information point in the information document for WVTA and are approved with regard of fitting of tyres. But they are not part of the fuel consumption approval and have no RRC. They argue that these tyres are not fitted during production from the vehicle manufacturer and therefore there is no need to name a RRC and to consider this for the fuel consumption approval.

From our point of view, only tyres that fulfill all requirements for type-approval, including fuel-consumption and RRC, are allowed to be stated in WVTA and the COC. This was clearly written in the minutes from Luxembourg.

There is no need to name an extra winter tyre (M+S or alpine symbol) for retrofitting as it is allowed to use every tyre dimension stated by the manufacturer for a variant/version also as a winter tyre.

If there is a need to have an exclusive tyre dimension ONLY as a winter tyre, this tyre has to be taken into consideration also for the type approval according to fuel consumption even if

the manufacturer states that this tyre will not be fitted to production vehicle, because the WVTA generally allows him to do so.

**Position:**

From our point of view and according to article 37 of framework directive it is not allowed to state tyre dimensions in the COC that are not named in the type-approval for this vehicle Type, variant and version (fitment and fuel consumption).  
 The statement of the minutes from TAAM Geneva 2013 may lead to misunderstanding and the last sentence should be deleted.

**Questions:**

**Do you agree to the position stated under 1) and 2) ?**

Possibilities of solution

Comments

1 + 2	<b>A</b>	Yes	
	<b>B</b>	No Please comment	

<b>Type approving authority "e"</b>	1
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Selection of solution		accepted	refused
	<b>A</b>	x	
	<b>B</b>		x

The meeting agreed on solution A. However, the view is not completely uniform.

6.7. Off road vehicles, Annex II, subparagraph 4.3: Symbol G

(Netherlands 1)

Questions by the TAAM delegation of the Netherlands  
RDW-TAAM-2014-007

<b>Directive or Regulation number:</b>
2007/46/EG
<b>Subject:</b>
off-road vehicle

<b>Reference to Annex, etc in the Directive or Regulation:</b>
2007/46/EC, Annex II, subparagraph 4.3: Symbol G

<b>Text:</b>
4.3. M 3 or N 3 vehicles whose maximum mass exceeds 12 tonnes shall be subcategorised as off-road vehicles if they satisfy the condition set out in point (a) or both conditions set out in points (b) and (c): .....

<b>Question:</b>
Concerning this question we refer to ‘5.3 2007/46/EC, Annex II, subparagraph 4.3: Symbol G’ in the Minutes of the TAAM in Sofia, Bulgaria in 2010 (see annex). The conclusion was that ‘the meeting recognised that the legislation is not completely clear in respect of auxiliary drives. It was explained that this question represented a hypothetical case and, whilst there was general support in principle for solutions 18 and 2A, the meeting agreed that it should wait for a real example before reaching a formal conclusion.’
Now a manufacturer has applied an European type-approval of a N3 Lorry with two axles. The lorry has a shaft driven back wheel drive and a hydrostatic front wheel drive. The hydrostatic system provides a driving mode and a “Free Wheeling” mode.
The maximum torque of the hydraulic wheel drive amounts to 5500 Nm per wheel. The hydraulic drive on the front axle can be activated up to a maximum speed of 25 km/h. Above that speed the hydraulic drive will be automatically switched off. However, the hydraulic drive will be automatically switched on again in case the vehicle speed will be reduced to a speed less the 25 km/h within 60 seconds.
Furthermore, the system automatically will be switched off by opening a door, or if ESP will be activated.
<b>Question:</b>
Do you always consider a wheel that is propelled by an auxiliary drive as a drive wheel or do you support a limitation for slow or weak auxiliary drives?

<b>Solutions:</b>	
A	Axles with wheels that are propelled by an auxiliary drive should always be considered as driven axles.
B	Axles with weak and/or slow auxiliary driven wheels can only be counted as drive axles when certain minimal requirements are met.
C	The specification ‘ <i>simultaneously</i> ’ in (a) <i>all their axles are driven simultaneously</i> , irrespective of whether one or more powered axles can be disengaged and (b) (i) <i>at least half of the axles (or two axles out of the three in the case of a three axle vehicle and mutatis mutandis in the case of a five axle vehicle) is designed to be driven simultaneously</i> , irrespective of whether one powered axle can be disengaged means the wheels that can be powered by the main driving system at the same time. Auxiliary drive systems will be left aside in the ‘Criteria for the subcategorisation of vehicles as off-road vehicles’.

<b>Decision:</b>		
<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A		X
B		X



**Questions by the TAAM delegation of the Netherlands  
RDW-TAAM-2014-007**

C	X	
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<b>Authority:</b>	
Type approval Authority e/E	4

<b>Remarks:</b>
Please note that in the case a vehicle is considered to be an off-road vehicle, some requirements do not apply, e.g. requirements in the field of AEBS, LDWS and ESP, front underrun protection, spray suppression systems. Other requirements are in a modified form of application, e.g. requirements concerning sound levels and technically permissible masses.

This question will be moved to next TAAM session. Firstly, there is necessary to clarify the minimum requirements.

6.8. Choice of tyres for vehicle road load measurement, Regulation (EC) No. 715/2007; Regulation (EC) No. 692/2008; Access to vehicle OBD and vehicle RMI (Netherlands 2)

Questions by the TAAM delegation of the Netherlands

RDW-TAAM-2014-008

v1.00 – 14 March 2008

<b>Directive or Regulation number:</b>
Regulation (EC) No 715/2007; Regulation 692/2008 Access to vehicle OBD and vehicle RMI
<b>Subject:</b>
Choice of tyres for vehicle road load measurement

<b>Reference to Annex, etc. in the Directive or Regulation:</b>
Annex III, Paragraph 3.5

<b>Text:</b>
<p>Tyres</p> <p>The choice of tyres shall be based on the rolling resistance. The tyres with the highest rolling resistance shall be chosen, measured according to ISO 28580. If there are more than three tyre rolling resistances, the tyre with the second highest rolling resistance shall be chosen. The rolling resistance characteristics of the tyres fitted to production vehicles shall reflect those of the tyres used for type-approval</p>

<b>Question:</b>
Which rolling resistance of the tyres fitted to production vehicles is acceptable for determining the tyre to be used during the vehicle road load measurement?

<b>Solutions:</b>		
A	The rolling resistance as indicated in item 6.3. on R117 certificates of the concerned tyres	
B	The rolling resistance as supplied by the tyre manufacturer	
C	The rolling resistance used for the tyre labelling	
D	The rolling resistance as measured by the vehicle manufacturer	
E	Any other method?	

<b>Decision:</b>		
<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A		
B		
C		
D		

<b>Authority:</b>
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## Questions by the TAAM delegation of the Netherlands

**RDW-TAAM-2014-008**

*v1.00 – 14 March 2008*

Type approval Authority e/E **4**

### **Remarks:**

The Regulation 715/2007 requires to choose the tyre with the highest tyre rolling resistance, based upon a measurement according to ISO 28580. There is no method described where this information may be derived from. The only certified information comes from ECE R117 tyre approvals. Down side is that it concerns an approval for a type of tyre, which can consist of a range of tyre sizes. The reflected Rr value thus gives a worst case value, not necessarily reflecting the actual tyre. The tyre label only applies for tyres that are sold after market, which are not necessarily tyres for installation by the vehicle manufacturer. RDW aims to have an open discussion with the other TAAM members in order to achieve a general consensus about which method(s) would be acceptable to all.

The meeting agreed on solution B or D. The rolling resistance as supplied by the tyre manufacturer or the rolling resistance as measured by the vehicle manufacturer.

**6.9. Technical data in Information document for WVTAs – Partly access for the industry and public** (Norway 1)

**Directive: 2007/46/EC (Motor vehicles and their trailers)**

**Subject: Technical data in Information document for WVTAs – Partly access for the industry and public**

In Norway the technical data from the information document in the WVTAs at ETAES are stored in our own data-base, to be used for registration purposes, approval, taxation etc.

We are now planning to expose an extract of the data in to our open web-site. The data concerned is WVTA no., type/variant/version, vehicle category, masses, dimensions, power plant, tires/rims, consumption/CO2/NOx.

We will NOT expose info like drawings, pictures, COCs, system approval numbers, remarks etc.

This is meant as general info both for the industry and the public to be interested.

The system will only allow single entry, not downloading of data.

We know this is already done in different ways in some countries.

This raise the following question:

1. Are we allowed to expose such an extract of technical data from WVTAs in an open web-site?

Type approval authority “e”

16

This is very complex problem. There was no unique solution found. It should be in the hands of local authorities.

This question will be moved to next TAAM session.

**6.10. Definition of VERSION for M1 (and N1), Different max. power within one Type/Variant/Version**

(Norway 2)

**Directive: 2007/46/EC (Motor vehicles and their trailers)**

**Subject: Definition of VERSION for M1 (and N1),  
Different max. power within one Type/Variant/Version?**

In dir. 2007/46/EC, definition of t/v/v for M1 is given in annex II Part B no. 1.

**1.3. Version**

No. 1.3.1. A ‘version’ within a variant shall group the vehicles which have all the following features in common:

.....

(c) the maximum engine power output or the maximum continuous rated power (electric motor);

.....

We sometimes see that one specific variant and version of a type may have different max. engine power output.

In Norway we mostly use the technical data from the information document in the WVTA, and not the COC. Then it is not possible to specify the engine power correct if a version may have different values for this

**QUESTION:**

**Is it allowed - according to the definition in dir. 2007/46/EC - to have different values for max. engine power within one version?**

Type approval authority “e”	16
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Opinion of TAAM session: There should be two versions of the vehicle.

## 6.11. Suspension for trailers, Annexes I and III

(Sweden 2)

SUBJECT: Suspension for trailers

DIRECTIVE: 2007/46/EC

### Annexes I and III

item 6:

#### 6. SUSPENSION

6.2. Type and design of the suspension of each axle or wheel: .....

### Annex II

item 5.3.1 (for O1 and O2 vehicles)

A 'version' within a variant shall group the vehicles which have all the following features in common:

(b) the concept of the suspension (air, steel or rubber suspension, torsion bar or other)

item 6.2.1 (for O3 and O4 vehicles)

(c): A 'variant' within a vehicle type shall group the vehicles which have all of the following construction and design features in common:

(c) the concept of the suspensions (steel, air or hydraulic suspension)

### QUESTION:

Can item 6 in annex I and/or III be filled in with "not applicable" meaning that a trailer without suspension could be type approved according to 2007/46/EC? Annex II points out different types of suspension, not specifically that a suspension is mandatory.

Or could a trailer without suspension be considered to fall under article 8.3 in 2007/46/EC;

If a Member State finds that a type of vehicle, system, component or separate technical unit, albeit in conformity with the required provisions, presents a serious risk to road safety or seriously harms the environment or seriously harms public health, it may refuse to grant EC type-approval.

Type approving authority "e"	5
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Selection of solution		accepted	refused
A trailer without suspension <u>can</u> get an EC WVTA	<b>A</b>		
A trailer without suspension <u>cannot</u> get an EC WVTA	<b>B</b>		

The meeting agreed on solution A. But not in all cases, there must be a specific limitation.

**6.12 Pedestrian protection leg form to bumper impact concession areas.  
Regulation (EC) No. 78/2009, Annex I, paragraph 3.1, UNECE R127  
paragraph 5.1.1. (UK 1)**

**Regulation or Directive Number:**

78/2009 Annex I paragraph 3.1  
UN R127 paragraph 5.1.1

**Subject:** Pedestrian protection leg form to bumper impact concession areas.

**Legislation**

78/2009 Annex I

3. The following tests are required to be performed on vehicles:

3.1. Legform to bumper:

One of the following tests is required to be performed:

(a) lower legform to bumper:

the test is performed at an impact speed of 40 km/h. The maximum dynamic knee bending angle shall not exceed 19,0 °, the maximum dynamic knee shearing displacement shall not exceed 6,0 mm, and the acceleration measured at the upper end of the tibia shall not exceed 170 g.

In addition, the manufacturer may nominate bumper test widths of up to 264 mm in total where the acceleration measured at the upper end of the tibia shall not exceed 250 g;

ECE R127:

5.1.1. Lower Legform to Bumper:

When tested in accordance with Annex 5, Paragraph 1. (lower legform to bumper), the maximum dynamic knee bending angle shall not exceed 19°, the maximum dynamic knee shearing displacement shall not exceed 6.0 mm, and the acceleration measured at the upper end of the tibia shall not exceed 170 g. In addition, the manufacturer may nominate bumper test widths up to a maximum of 264 mm in total where the acceleration measured at the upper end of the tibia shall not exceed 250 g.

**Discussion**

The underlined text allows a manufacturer to declare widths of the bumper where higher deceleration can be permitted, for example where hard mounting points or crush structures are sited. The word used is “widths” i.e. in the plural sense, suggesting that more than one width can be declared. It is relevant to note that the leg form width is 132mm, suggesting it may have been intended to permit two areas of 132mm width each to allow, for example, one hard mounting point each side of the vehicle centreline.

The impact location tolerance in Annex 5 para 1.10 is +/-10mm which would suggest a minimum 20mm width of declared area to achieve the tolerance in practical testing, assuming a central target point.

If the target point is outside the width but overlap of the impactor and the declared width occurs then a higher deceleration may be seen, but it may not be appropriate to permit the higher deceleration. The same issue occurs for the equivalent headform to bonnet top tests,

between the HIC1000 and HIC1700 impact zones. For these it is clear that the performance requirement that applies is that which relates to the zone in which the target point is located, even if overlap occurs. However, impactor overlap is not permitted at the outer boundaries of the bonnet top test area or at the division between the adult and child impact areas.

If the higher deceleration is applicable only when the target point is within the declared width then it will be the interests of the manufacturer to declare as wide a width as possible in order to avoid having a target point outside the declared area but close to a hard point on the bumper.

**Questions**

1. Does the word “widths” – in the plural sense - allow the manufacturer to declare several areas adding up to a total width of 264mm?
2. If several areas are permitted, is there a minimum width that would be permissible?
3. Should the higher deceleration be permitted only if the target point is within the declared width?

**Suggested Answers**

Type approving authority "e"	11
Question	Suggested answer
1	Yes
2	Yes – 20mm
3	Yes

The meeting agreed with “yes” answer for 1, 2 and 3. Discussion was held on point 2 - to keep 20 mm or not? According to the majority of delegations this reading could be omitted.



## 6.13. Multi stage final stage VINs

(Ireland 1)

Question N°: NSAI No. 1: Multi Stage Final Stage VINs

**Reference:** Directive 2007/46/EC as amended by 2013/15/EU, Annex XVII  
**International standard ISO 3779 - Road Vehicles -Vehicle identification number (VIN)**  
**International standard ISO 3780 – Road Vehicles –World manufacturer identifier (WMI)**

### Extracts from referenced documents

#### Extract from Annex XVII of 2007/46/EC

## 4. IDENTIFICATION OF THE VEHICLE

### 4.1. Vehicle identification number

(a) The identification number of the base vehicle (VIN) prescribed by Directive 76/114/EEC shall be retained during all the subsequent stages of the type-approval process to ensure the ‘traceability’ of the process.

(b) However, at the final stage of completion, the manufacturer concerned by this stage may replace, in agreement with the approval authority, the **first and second sections** of the vehicle identification number by his own vehicle manufacturer code and the vehicle identification code if, and only if, **the vehicle has to be registered under his own tradename**. In such a case, the complete vehicle identification number of the base vehicle shall not be deleted.

### 4.2. Additional manufacturer’s plate

At the second and subsequent stages, in addition to the statutory plate prescribed by Directive 76/114/EEC, each manufacturer must affix to the vehicle an additional plate the model of which is shown in the appendix to this Annex. This plate must be firmly attached, in

conspicuous and readily accessible position on a part not subject to replacement in use. It must show clearly and indelibly the following information in the order listed:

- name of the manufacturer,
- Sections 1, 3 and 4 of the EC type-approval number,
- the stage of approval,
- vehicle identification number,
- maximum permissible laden mass of the vehicle **(a)**,
- maximum permissible laden mass of the combination (where the vehicle is permitted to tow a trailer) **(a)**,
- maximum permissible mass on each axle, listed in order from front to rear **(a)**,
- in the case of a semi-trailer or centre axle trailer, the maximum permitted mass on the coupling device **(a)**.

Unless otherwise provided for above, the plate must comply with the requirements of Directive 76/114/EEC.

(a) Only where the value has changed during the current stage of approval.

**Extract from International standard ISO 3779-1983 - Road Vehicles -Vehicle identification number (VIN)**

**4. Definitions**

**4.2 WMI**

The **first** section of the VIN, designating the manufacturer of the vehicle. The code is assigned to a vehicle manufacturer in order to allow identification of the said manufacturer and when used in conjunction with the remaining sections of the VIN, ensures uniqueness of the VIN for all vehicles manufactured in the world for a period of 30 years

**4.3 Vehicle descriptor section (VDS)**

The **second** section of the VIN. It provides information describing the general attributes of the vehicle

**4.4 Vehicle indicator section (VIS)**

The **last** section of the VIN. It is a combination of characters assigned by the manufacturer to distinguish one vehicle from another

**5. Requirements**

**5.1 VIN basic content**

The VIN shall consist of three sections: **first**, the world manufacturer identifier (WMI) section, **second**, the vehicle descriptor section (VDS) and **last** the vehicle indicator section (VIS)

**Extract from International standard ISO 3780 – Road Vehicles –World manufacturer identifier (WMI)**

**6. Specific characteristics required for the characters required for the characters in the WMI**

**6.1 First Position**

An alphabetic or numeric character designating a geographic area. More than one character may be assigned to a geographic area, based on anticipated needs

**6.2 Second position**

An alphabetic or numeric character designating a country within a specific geographic area. More than one character may be assigned to a country, based on anticipated needs. **It is necessary to use a combination of the first and second characters to ensure unique identification of the country.**

**6.4 Third position**

**6.4.1** An alphabetic or numeric character assigned by the National Organisation to designate a specific manufacturer. It is necessary to use a combination of the first, second and third characters to ensure unique identification of the manufacturer

**6.4.2 The number 9 in this position shall be used** by each National Organisation to permit identification of all manufacturers **producing fewer than 500 vehicles per year. For such a manufacturer, the 3<sup>rd</sup>, 4<sup>th</sup> and 5<sup>th</sup> Characters of the VIS (third section of the VIN defined in ISO 3779) shall be assigned by the National Organisation and will identify the specific manufacturer**

<b>Question 1</b>		
For a multi stage National Small Series Type Approval (NSSTA) which involves a “bodybuilder” fitting a body to an incomplete chassis cab and issuing a completed COC for the vehicle, which of the following solutions in relation to the VIN do the other TAA consider to be the most appropriate		
<b>Solutions</b>		
	<b>Accepted</b>	<b>Refused</b>
<b>A : As the final stage manufacturer, they must generate a completely new VIN with their own WMI VDS and VIS</b>		
<b>B : As the final stage manufacturer, they may only replace the WMI and the VDS of the base VIN</b>		
<b>C : As the final stage manufacturer, they may retain the base VIN</b>		
<b>D : Other solution ???</b>		

<b>Question 2</b>		
If you agree with solution B above, in the event that the manufacturer concerned manufacturers less than 500 vehicles and the main identifier of their WMI is present in the VIS section of the VIN (in accordance with ISO3780 section 6.4.2), how shall they be uniquely identified if Annex XVII section 4.1 of 2007/46/EC only allows the first and second sections of the VIN to be replaced?		
<b>Solutions</b>		
	<b>Accepted</b>	<b>Refused</b>
<b>A : In such instances the manufacturer involved may replace in agreement with the approval authority the entire VIN on their final stage plate i.e. solution A above</b>		
<b>B : Other solution ???</b>		

<b>Question 3</b>		
For a multi stage National Individual Vehicle Approval (IVA) which involves a “bodybuilder” fitting a body to an incomplete chassis cab, as the IVA certificate shall be used as the registration document, do you agree it is acceptable for the IVA certificate to retain the base vehicles VIN and trade name?		
<b>Solutions</b>		
	<b>Accepted</b>	<b>Refused</b>
<b>A : In this instance, as a completed COC is not being generated, the base vehicles trade name and VIN shall be stated on the IVA certificate and used for registration purposes</b>		
<b>B : Other solution ???</b>		

The meeting agreed on solution 1C - the final stage manufacturer may retain the base VIN.  
Question 2 – no need to answer.  
As to question 3 the flexibility was recommended.

**6.14. Categorisation of vehicles –Sight seeing trains**

**(Ireland 2)**

**Question N°: NSAI No. 2: Categorisation of vehicles –Sight seeing trains**

**Reference: Directive 2007/46/EC as amended by 2013/15/EU**

**Photo examples**



Questions		
Have any of the other TAA's type approved (on a national or European level) the combination vehicle as in the photos above?	Yes	No
<p>If so, What category was assigned to the towing vehicle and trailer?</p> <p>Did the seats require seat belt and anchorages and if so, to what level of testing?</p> <p>If the passenger compartment contained more than 8 passenger seats, should the requirements of UN-ECE R107 bus and coach regulation also be applied ?</p>		

This vehicle can be approved only on national base. Some countries have specially requirements for use of this combination of vehicles.

## 7. Questions relating to framework directive 2002/24/EC ((EU) no. 168/2013)

### 7.1. Regulation (EU) No. 168/2013, article 19: prohibition of defeat devices

(Germany 2)

#### Reference:

#### **Regulation (EU) No. 168/2013, article 19: prohibition of defeat devices**

The use of defeat devices that reduce the effectiveness of safety, electromagnetic compatibility, the on-board diagnostics system, sound abatement or pollutant emission abatement systems shall be prohibited. An element of design shall not be considered as defeat device if any of the following conditions is met:

- (a) the need for the device is justified in terms of protecting the engine against damage or accident and ensuring safe operation of the vehicle;
- (b) the device does not function beyond the requirements of engine starting;
- (c) the operating conditions are included to a substantial extent in the test procedures for verifying if the vehicle complies with this Regulation and with the delegated and implementing acts adopted pursuant to this Regulation.

#### Issue:

1) Many manufacturers use flaps in the exhaust systems of vehicles approved on the basis of directive 2002/24/EC. The new Regulation (EU) No 168/2013 has more stringent and clear requirements e.g. in article 19 about defeat devices and some of the today installed flaps will be in the future not any longer allowed. But there are also some exceptions defined. Elements like flaps shall not be considered as defeat devices, if the conditions of letter a), b) or c) are fulfilled.

The experience shows, that a flap in the exhaust system will normally not fulfil letter a).

So from our point of view it's according to c) only allowed to use flaps in the exhaust system, if the noise emission of the vehicle is tested with the requirements according to Regulation No 41, 04 series of amendments, because this regulation allows different operating principles for the silencer and considers "worst case" testing for the first time with the series 04.

2) Article 19 a) of Regulation (EU) No 168/2013 also defines, that elements for engine protection, against damage or accident and ensuring safe operation of the vehicle shall not be considered as defeat devices.

What kind of confirmation should be accepted?

Is a single declaration by the manufacturer to confirm the function and the reason for the existence of those elements sufficient or is a clear confirmation from a Technical Service with a test report necessary.

#### Questions 1:

**Do you agree to the position stated under 1)?**

Possibilities of solution

Comments

1	A	Yes	Flaps are allowed, if the noise tests are done with the UN-R 41.04
	B	No Please comment	

Type approving authority "e"	1
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Selection of solution		accepted	refused
	A	x	
	B		x

**Questions 2:**

**What kind of confirmation is sufficient to define elements of article 19 letter a) not as defeat devices?**

Possibilities of solution

Comments

2	A	Yes	The Technical Service shall confirm this in the test report.
	B	No	

Type approving authority "e"	1
------------------------------	---

Selection of solution		accepted	refused
	A	x	
	B		x

The meeting agreed after longer discussion on solution 1A for questions 1. The answer to questions 2 was ambiguous nevertheless for majority of delegates solution 2A was acceptable - with possible addition of test requirements.



**7.2. Type designation according to Directive 2002/24/EC and Regulation (EU)  
No. 168/2013** **(Germany 3)**

**Reference:**

**Article 26**

**Application for type-approval**

1. The manufacturer shall submit the application for type- approval to the approval authority.
2. Only one application may be submitted in respect of a particular type of vehicle, system, component or separate technical unit and it may be submitted in only one Member State.

**Article 3**

**Definitions**

(73) ‘vehicle type’ means a group of vehicles, including variants and versions of a particular category that do not differ in at least the following essential respects:

- (a) category and subcategory;
- (b) manufacturer;
- (c) chassis, frame, sub-frame, floor pan or structure to which major components are attached;
- (d) type designation given by the manufacturer

**Article 77**

**transitional provisions**

1. Without prejudice to other provisions of this Regulation, this Regulation shall not invalidate any EU type-approval granted to vehicles or to systems, components or separate technical units before 1 January 2016.

**Issue:**

A Manufacturer wants to get a type-approval for a vehicle according to Regulation (EU) No 168/2013 which is regarding to type designation, manufacturer name, chassis, frame and category of the vehicle nearly the same like an already approved vehicle according to Directive 2002/24/EC. It only differs in subcategory (subcategories does not exist in the 2002/24/EC) and maybe in some details caused on new requirements.

The type-approval according to Directive 2002/24/EC is still valid, so there would be two technical nearly the same vehicles for the same manufacturer with the same type designation with two different approvals.

**Question:**

**Is it possible to get a type-approval for this vehicle according to Regulation (EU) No 168/2013 with the same type designation?**

Possibilities of solution

Comments

<b>A</b>	Yes	The legal basis for the type-approvals according to Regulation (EU) No 168/2013 are not the same, the vehicle is defined in a new subcategory and gets an approval number according to Regulation (EU) No 168/2013.
<b>B</b>	No	The differences between the two described vehicles are insignificant. They are of the same type and in accordance with article 3 the manufacturer can only get one type-approval with this type designation.

<b>Type approving authority "e"</b>	1
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Selection of solution		accepted	refused
	<b>A</b>	x	
	<b>B</b>		x

Opinions of individual authorities were different.  
This question will be moved to next TAAM session.

## **8. Questions relating to framework directive 2003/37/EC (agricultural and forestry tractors):**

### **8.1. End of series procedure for tractors (Directive 2000/25/EC)**

(Romania 2)

#### Texts:

#### **Directive 2003/37/EC:**

##### *Article 10*

#### **End-of-series vehicles**

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

The first subparagraph shall apply solely to vehicles which:

(a) are on Community territory, and

(b) are accompanied by a valid certificate of conformity issued when the EC type-approval of the vehicle in question was still valid, but which was not registered or placed in service before the said approval lost its validity.

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

#### **Directive 2000/25/EC – case 1**

##### *Article 3a*

#### **Flexibility scheme**

By way of derogation from Article 3(1) and (2), Member States shall provide that, at the request of the tractor manufacturer, and on condition that the approval authority has granted the relevant permit for placing on the market in accordance with the procedures laid down in Annex IV, a limited number of tractors fitted with engines approved in accordance with the requirements of the emission limits stage immediately preceding the applicable one may enter into service.

The flexibility scheme shall begin when a given stage becomes applicable and shall have the same duration as the stage itself. The flexibility scheme set out in section 1.2 of Annex IV shall, however, be restricted to the duration of Stage III B or to three years where no subsequent stage exists.

#### **Directive 2000/25/EC – case 2**

##### *Article 4*

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

#### **Directive 2000/25/EC – case 3**

##### *Article 4*

9. By way of derogation, the dates set out in points (d) and (e) of paragraph 2 and in paragraph 3 shall, for tractors of categories T2, T4.1 and C2, as defined respectively in the second indent of point A.1 of Chapter A, in point 1.1 of Part I of Appendix 1 of Chapter B, and in point A.2 of Chapter A of Annex II to Directive 2003/37/EC, and equipped with engines of categories L to R, be postponed for 3 years. Until such dates, the requirements of Stage III A in this Directive shall continue to apply.

#### Comments:

The Directive 2003/37/EC, according to the end-of-series procedure, provides the possibility to register, to sale or to place into service new tractors to a type of vehicle which the EC type-approval is no longer valid, only if they are accompanied by a valid CoC issued when the said approval was still valid, but which were not registered or placed in service before the said approval lost its validity.

The Directive 2000/25/EC provides more “derogations” (see cases 1 to 3) to place on the market tractors fitted with engines for which the EC type-approval is no longer valid. It is not clear whether the CoC issued using the mentioned derogation could be use for the end-of-series procedure.

Our questions refers to the tractors placed on the market using the derogations mentioned in the cases 1 to 3 (tractors fitted with engines for which the EC type-approval is no longer valid), but not sold until the derogation period ended. The only possibility to register these tractors would be to apply also the end-of-series procedure, after the derogation period.

**Question 1:** the CoC issued during the derogation period provided in the Directive 2000/25/EC (cases 1 to 3) could be considered valid for the application of the end-of-series procedure after the end of the derogation period ?

	Possibilities of solutions	accepted	refused
<b>Case 1</b>			
A	<b>Yes</b>	x	
B	<b>No</b> , it is valid only during the flexibility period		x
<b>Case 2</b>			
A	<b>Yes</b>	x	
B	<b>No</b> , it is valid only during the postponement period		x
<b>Case 3</b>			
A	<b>Yes</b>	x	
B	<b>No</b> , it is valid only during the postponement period		x

**Question 2:** is it acceptable to apply the end-of-series procedure after the derogation period ?

	Possibilities of solutions	accepted	refused
<b>Case 1</b>			
A	<b>Yes</b> , after the end of the flexibility period it is possible to apply the end-of-series	x	

	procedure.		
B	No, after the end of the flexibility period it is not possible to apply the end-of-series procedure.		x
<b>Case 2</b>			
A	Yes, after the end of the postponement period it is possible to apply the end-of-series procedure.	x	
B	No, after the end of the postponement period it is not possible to apply the end-of-series procedure.		x
<b>Case 3</b>			
A	Yes, after the end of the postponement period it is possible to apply the end-of-series procedure.	x	
B	No, after the end of the postponement period it is not possible to apply the end-of-series procedure.		x

The meeting agreed on solution 1A, 2A and 3A in question 1. Replies to question 2 were similar - answer 2A, 2B and 3C.

## 8.2. Risk not covered by Regulation (EU) No 167/2013

(Bulgaria 1)

### *Background*

#### *Regulation (EU) No 167/2013 - Article 2. Scope*

1. This Regulation shall apply to agricultural and forestry vehicles, as described in Article 4, designed and constructed in one or more stages, and to systems, components and separate technical units, as well as parts and equipment, designed and constructed for such vehicles.

Specifically, this Regulation shall apply to the following vehicles:

- (a) tractors (categories T and C);
- (b) trailers (category R); and
- (c) interchangeable towed equipment (category S).

....

3. For the following vehicles, the manufacturer may choose whether to apply for approval under this Regulation or whether to comply with the relevant national requirements:

- (a) trailers (category R) and interchangeable towed equipment (category S);
- (b) track-laying tractors (category C);
- (c) special purpose wheeled tractors (categories T4.1 and T4.2).

#### *Draft Regulation on Administrative Requirements (possible vote on 26.11.2014), Annex I Template for the information document and for the information folder*

##### **Part B Information document**

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#### **61. FOR R- AND S-CATEGORY VEHICLES, COMPLIANCE WITH DIRECTIVE 2006/42/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (for the risk not covered by Regulation (EU) No 167/2013)**

- 61.1. Standards and other technical specifications used, indicating the essential health and safety requirements covered by them (if available):.....
- 61.2. Technical report(s) giving the results of the tests carried out either by the manufacturer or by a body chosen by the manufacturer or his authorized representative (if available):.....

**Question:** We would like to obtain the opinions of the other MS on the following:

1. If the text of point 61 from draft RAR is adopted at present form, how will TAA proceed in the type-approval process, because TAA has no competence under Machinery Directive?

In our view, for the risks not covered under R167/2013 for R/S, the manufacturer only must present a copy of declaration of conformity under Machinery Directive.

In TAAM opinion the risk is not covered under R167/2013 for R/S, the manufacturer must only present a copy of declaration of conformity under Machinery Directive.

## 9. Questions relating to UNECE Regulations

### 9.1. Application of UNECE Regulation No. 66 for granting of whole vehicle type-approval

(CZ 2)

Directive or Regulation
UNECE R66 (EC) 661/2009 2007/46/EC
Legislation basis
<u>UNECE Regulation 66.02</u> 1. Scope 1.1. This Regulation applies to single-deck rigid or articulated vehicles belonging to categories M2 or M3, Classes II or III <b>or class B having more than 16 passengers.</b> <i>(Former wording according to 66.01, supplement 1:</i> <i>1.1. This Regulation applies to single-deck rigid or articulated vehicles belonging to Classes II or III.)</i>  10. TRANSITIONAL PROVISIONS 10.1. As from the official date of entry into force of the 01 series of amendments, no Contracting Party applying this Regulation shall refuse to grant ECE approval under this Regulation as amended by the 01 series of amendments. 10.2. As from 60 months after the date of entry into force, Contracting Parties applying this Regulation shall grant ECE approvals for new vehicle types as defined in this Regulation only if the vehicle type to be approved meets the requirements of this Regulation as amended by the 01 series of amendments. 10.3. Contracting Parties applying this Regulation shall not refuse to grant extensions of approval to the preceding series of amendments to this Regulation. 10.4. ECE approvals granted under this Regulation, in its original form, earlier than 60 months after the date of entry into force and all extensions of such approvals, shall remain valid indefinitely, subject to paragraph 10.6. below. When the vehicle type approved to the preceding series of amendments meets the requirements of this Regulation as amended by the 01 series of amendments, the Contracting Party which granted the approval shall notify the other Contracting Parties applying this Regulation thereof. 10.5. No Contracting Party applying this Regulation shall refuse national type approval of a vehicle type approved to the 01 series of amendments to this Regulation. <b>10.6. Starting 144 months after the entry into force of the 01 series of amendments to this Regulation, Contracting Parties applying this Regulation may refuse first national registration (first entry into service) of a vehicle which does not meet the requirements of the 01 series of amendments to this Regulation.</b> 10.7. As from the date of entry into force of the 02 series of amendments, no Contracting Parties applying this Regulation shall refuse to grant approval under this Regulation as amended by the 02 series of amendments. <b>10.8. Until 48 months after the date of entry into force of the 02 series of amendments, no Contracting Parties shall refuse national or regional approval of a vehicle approved to the preceding series of amendments to this Regulation.</b> <b>10.9. As from 9 November 2017, Contracting Parties may refuse first registration of a new vehicle which does not meet the requirements of the 02 series of amendments to this Regulation.</b> 10.10. Notwithstanding paragraphs 10.8 and 10.9, approvals of vehicle categories and classes

granted to the preceding series of amendments to the Regulation, which are not affected by the 02 series of amendments, shall remain valid and Contracting Parties applying the Regulation shall continue to accept them.

**10.11. Contracting Parties applying this Regulation shall not refuse to grant extensions of approval to the preceding series of amendments to this Regulation.**

ECE/TRANS/WP.29/343/Rev.22 (Status of the Agreement, Revision 22)

**UN Regulation No. 66 - Strength of superstructure (buses)**

Document reference E/ECE/324/Rev.1 E/ECE/TRANS/505/Rev.1	Status of document	Date of entry into force	Adopted by AC.1				Notes
			Session (date)	Report ECE/TRANS/WP.29/...	Adopted document ECE/TRANS/WP.29/...	Transmitted by	
Add.65	00	01.12.86	76	144, paras. 72-74	150	Hungary, United Kingdom	
Add.65/Amend.1	Suppl.1 to 00	03.09.97	110	516, para. 116	527	AC.1 (4 <sup>th</sup> )	
Add.65/Rev.1	01	09.11.05	135	1039, para. 91	2005/18	AC.1 (29 <sup>th</sup> )	
Add.65/Rev.1/Corr.1	Erratum to Rev.1	-	-	-	-	Secretariat	
Add.65/Rev.1/Corr.2	Corr.1 to 01	15.11.06	140 (Nov. 06)	1056, para. 85	2006/103	AC.1 (34 <sup>th</sup> )	
Add.65/Rev.1/Corr.3	Corr.2 to 01	14.03.07	141 (Mar. 07)	1058, para. 74	2007/12	AC.1 (35 <sup>th</sup> )	
Add.65/Rev.1/Amend.1	Suppl.1 to 01	15.10.08	144 (Mar. 08)	1066, para. 56	2008/42	AC.1 (38 <sup>th</sup> )	
Add.65/Rev.1/Amend.2	02	19.08.10	149 (Nov. 09)	1079, para. 89	2009/100	AC.1 (43 <sup>rd</sup> )	

2007/46/EC, Annex IV, Part I, as last amended by Regulation (EU) No 540/2014

Item	Subject	Regulatory act	Applicability											
			M <sub>1</sub>	M <sub>2</sub>	M <sub>3</sub>	N <sub>1</sub>	N <sub>2</sub>	N <sub>3</sub>	O <sub>1</sub>	O <sub>2</sub>	O <sub>3</sub>	O <sub>4</sub>		
51	Flammability	Directive 95/28/EC			X									
51A	Burning behaviour of materials used in the interior construction of certain categories of motor vehicles	Regulation (EC) No 661/2009 UNECE Regulation No 118			X									
52	Buses and coaches	Directive 2001/85/EC		X	X									
52A	M <sub>2</sub> and M <sub>3</sub> vehicles	Regulation (EC) No 661/2009 UNECE Regulation No 107		X	X									
52B	Strength of the superstructure of large passenger vehicles	Regulation (EC) No 661/2009 UNECE Regulation No 66		X	X									
53	Frontal impact	Directive 96/79/EC	X <sup>(1)</sup>											

Regulation (EC) 661/2009 as last amended by Regulation (EU) No 523/2012

Annex IV – List of UNECE Regulations which apply on a compulsory basis

66	Strength of the superstructure of large passenger vehicles	02 series of amendments	OJ L 84, 30.3.2011, p. 1	M <sub>2</sub> , M <sub>3</sub>
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**Issue**

Series of amendments 02 to UNECE Regulation No 66 introduced more extended scope of application which impacts manufacturers of small buses.

We have encountered different opinions on application of the Regulation as the Transitional provisions are worded that Contracting parties “may refuse” granting of national or regional approval (i.e. WVTA).



Questions:			
<p>1) Is it possible to grant new whole vehicle type-approval to a vehicle of category M2, class B, having more than 16 but less than 22 passengers after 19.8.2014 (48 months after date of entry into force of R66.02) without demonstration of complying with requirements of UNECE R66.02 (no UNECE R66 approval exists as this vehicle was previously out of mandatory scope of the Regulation)?</p> <p>2) Is it possible to grant new whole vehicle type-approval to a vehicle of category M3, class III after 19.8.2014 (48 months after date of entry into force of R66.02) in case only approval according to UNECE R66.00 was demonstrated (UNECE R66 approval was granted in the past but WVTA is to be issued now)?</p>			
Possible solutions:			
		Solution	Comment
1	A	NO, nevertheless the vehicle was out of scope of the regulation in the past, for granting the WVTA proof of compliance with the requirements of the Regulation 66.02 must be demonstrated.	Regardless paragraph 10.6 of the Regulation 66.02 and with regard to paragraph 10.8 of the Regulation 66.02 vehicle type which is to be granted new WVTA must prove compliance with the Regulation.
	B	YES, the vehicle was out of scope of the regulation, therefore the dates for the first registration apply	WVTA may be granted without proof of compliance with the Regulation until 9 November 2017 with regard to both paragraphs 10.6. and 10.9.
2	A	NO, after 48 months after the date of entry into force of R66.02 vehicle type to be granted WVTA must comply with R66.02	Despite the fact that the approval granted according to R66.00 is still valid, according to paragraph 10.8. of the Regulation R66.02 granting of new regional approval (i.e. WVTA) shall be refused.
	B	YES, the approval granted according to R66.00 is still valid and considered sufficient for granting new WVTA	As the vehicle type already existed in the past for granting the approval according to R66.00 it is also considered as existing type for granting WVTA and therefore the dates set out in paragraphs 10.6. and 10.9 shall apply.
Type approval authority „e“		8	
Selection of solution		accepted	Refused
1	A		
	B		
2	A		
	B		

Opinions of individual authorities were very different.  
This question will be moved to next TAAM session. Or the Commission should solve it.

**9.2. Determination of the level of the instrument panel with regard to the ignition key, R 21.01, Annex 10, paragraph 2.4** (Netherlands 3)

**Questions by the TAAM delegation of the Netherlands**

**RDW-TAAM-003**

*v1.00 – 14 March 2008*

<b>Directive or Regulation number:</b>
ECE R21.01
<b>Subject:</b>
Determination of the level of the instrument panel with regard to the ignition key

<b>Reference to Annex, etc in the Directive or Regulation:</b>
Annex 10, paragraph 2.4

<b>Text:</b>
<p>Paragraph 2.4.</p> <p>The level of the instrument panel extends over the entire width of the passenger compartment and is defined by the rearmost points of contact of a vertical line with the surface of the instrument panel when the line is moved across the width of the vehicle. Where two or more points of contact occur simultaneously, the lower point of contact shall be used to establish the level of the instrument panel. In the case of consoles, if it is not possible to determine the level of the instrument panel by reference to the points of contact of a vertical line the level of the instrument panel shall be where a horizontal line 25.4 mm above the "H" point of the front seats intersects the console.</p>

<b>Question:</b>
Is the level of the instrument panel determined with the ignition key in place ?

<b>Solutions:</b>	
	yes, in the vehicle, the ignition key will always be present while driving, therefore it has to be considered when doing the determination of the level of the instrument panel
	no, paragraph 2.4 refers to the rearmost points of contact of the surface of a vertical line with the surface of the

## Questions by the TAAM delegation of the Netherlands

### RDW-TAAM-003

v1.00 – 14 March 2008

	instrument panel; the ignition key is not to be considered “the surface of the instrument panel”	
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<b>Decision:</b>		
<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A	X	
B		X

<b>Authority:</b>	
Type approval Authority e/E	4

<b>Remarks:</b>
<p>the ignition lock is often recessed such that, when determining the level of the instrument panel, it is above this line. That means, it falls in the exempted zone defined by paragraph 2.3.1. In reality, the driver would contact the ignition key with his knee, and the ignition key would be contacted by the kneeform described in Annex 7.</p> <p>If the level of the instrument panel is determined with the key in place and assuming the key is part of the surface of the instrument panel, the level of the instrument panel would go right through the ignition key.</p>

The meeting supported both solution A and B. The best solution will depend on actual situation.

**9.3. Composite material replacement brake discs, R 90, Annex 11, paragraph 2.1.**  
(Netherlands 4)

**Questions by the TAAM delegation of the Netherlands**

**RDW-TAAM-0002**

*v1.00 – 14 March 2008*

<b>Directive or Regulation number:</b>
ECE R90
<b>Subject:</b>
Composite material replacement brake discs

<b>Reference to Annex, etc in the Directive or Regulation:</b>
§2.1. of Annex 11 to ECE R90

<b>Text:</b>
The replacement brake disc/drum shall be fitted to the axle in question together with an accompanying brake lining which has been type approved according to Regulations Nos. 13 or 13-H or 90 available from the vehicle or axle manufacturer.

<b>Question:</b>
<p>If the OEM does not provide a Carbon Ceramic brake option is it still possible to approve a Carbon Ceramic aftermarket disc to UN ECE R90?          If so, what pads should be selected for testing?          The ceramic manufacturer believes using normal pads intended for steel discs on a carbon ceramic disc would not be suitable.</p>

<b>Solutions:</b>		
A	It is not possible to approve a composite aftermarket disc if the vehicle OEM does not provide a composite brake option.	
B	A specialist pad intended for a carbon ceramic could probably be approved to ECE R90 against a steel disc and then used to approve the ceramic disc	
C	A set of carbon ceramic disc with a specialist pad is used for approval tests and compared to a set of steel disc and normal pad. Despite paragraph 2.1. of annex 11.	

<b>Decision:</b>		
<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A		

**Questions by the TAAM delegation of the Netherlands**

**RDW-TAAM-0002**

*v1.00 – 14 March 2008*

B		
C		

**Authority:**

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

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The meeting supported solution A. It is not possible to approve a composite aftermarket disc if the vehicle OEM does not provide a composite brake option.

**9.4. R 79, Annex 4, paragraph 2.3., Warning signals in case of a failure of the auxiliary steering equipment (ASE) (Netherlands 5)**

**Questions by the TAAM delegation of the Netherlands**

**RDW-TAAM-005**

*v1.00 – 14 March 2008*

<b>Directive or Regulation number:</b>
ECE R79
<b>Subject:</b>
Warning signals in case of a failure of the auxiliary steering equipment (ASE)

<b>Reference to Annex, etc in the Directive or Regulation:</b>
Annex 4, Paragraph 2.3.

<b>Text:</b>
In the legislation the following is mentioned concerning the warning signals in case of a failure:
2.3.1. Except for parts of ASE not considered susceptible to breakdown as specified in paragraph 5.3.1.1. of this Regulation, the following failure of ASE shall be clearly brought to the attention of the driver.
2.3.1.1. A general cut-off of the ASE electrical or hydraulic control.
2.3.1.2. Failure of the ASE energy supply.
2.3.1.3. A break in the external wiring of the electrical control if fitted.

<b>Question:</b>
The mass (ground) of the ECU of an ASE is carried out with two different, separate wires. You could say that the grounding of the ECU is carried out in a redundant way, although this is not a mandatory requirement.
According to point 2.3.1.3. A brake in the external wiring of the electrical control should be brought to the attention of the driver.
Q1: Is this required if one of the two mass wires is broken?
Q2: Is this required if both of the two mass wires are broken?

<b>Solutions:</b>	
A1	Yes, this must be detected if one wire is broken
B1	No, this is not necessary while there is still a second mass which takes over function of the other mass wire
A2	Yes, this must be detected if both wires are broken
B2	No, this hasn't to be detected

<b>Decision:</b>		
<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A1	X	

**Questions by the TAAM delegation of the Netherlands**

**RDW-TAAM-005**

*v1.00 – 14 March 2008*

B1		X
A2	X	
B2		X

<b>Authority:</b>	
Type approval Authority e/E	4

<b>Remarks:</b>

The meeting supported solution A1 - this must be detected if one wire is broken; and A2 - this must be detected if both wires are broken.

**9.5 R 79, paragraph 5.2.1., Ratio between unsteered or articulated steered axles and friction-steered axles** (Netherlands 6)

**Questions by the TAAM delegation of the Netherlands**

**RDW-TAAM-001**

*v1.00 – 14 March 2008*

<b>Directive or Regulation number:</b>
ECE R79
<b>Subject:</b>
Ratio between unsteered or articulated steered axles and friction-steered axles

<b>Reference to Annex, etc in the Directive or Regulation:</b>
ECE R79, paragraph 5.2.1.

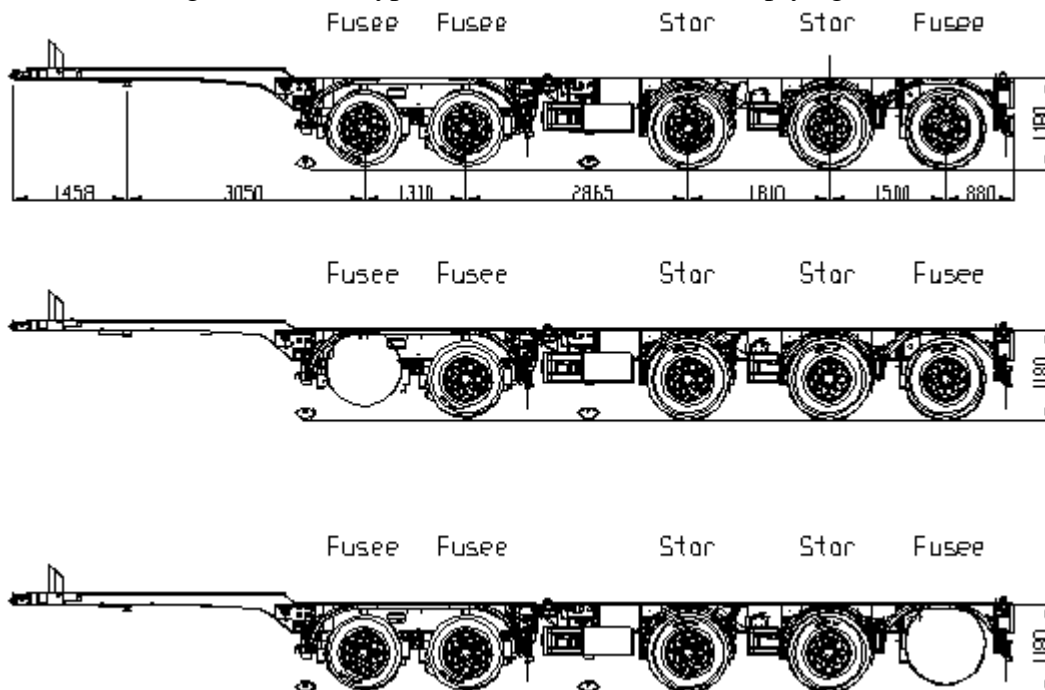
**Text:**

In ECE R79 the following text can be found concerning the ration between unsteered or articulated steered axles and friction-steered axles:

However for trailers with self-tracking steering equipment, the axle load ratio between unsteered or articulated steered axles and friction-steered axles shall be at least 1 under all loading conditions.

This is a new requirement in the R79 which was not mentioned in the EC 70/311. This means that several trailers have been approved under the 70/311 which don't comply with the ratio of 1 without any problems for stability or turning circles.

See the drawings below of a typical trailer which is not complying with the ratio of 1.



**Question:**



All these steered axles are mostly required to manoeuvre at low speeds at factory areas or at building sites. Unfortunately there is nothing mentioned about the speed at paragraph 5.2.1. where the ratio between unsteered or articulated steered axles and friction-steered axles is defined. It would be possible to construct the trailer that at low speeds all axles are steering (not complying with the ratio) and at higher speeds that the steered axles will be fixed so that the vehicle complies with the ratio of 1.

**Solutions:**

A	Under all conditions (speeds) the trailer should comply with the ratio of 1
B	Under low speed conditions (< 15 km/h) it is not mandatory to comply with the ratio of 1

**Decision:**

<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A	X	
B	X	

**Authority:**

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

Also other speeds than 15 km/h can be considered as options to lock steered axles in order to comply with this ratio of 1.

The meeting supported solution A – but solution B is also acceptable.

**9.6. R 48, paragraph 5.15., Colour conspicuity marking at the rear**

(Netherlands 7)

**Questions by the TAAM delegation of the Netherlands**

**RDW-TAAM-004**

v1.00 – 14 March 2008

<b>Directive or Regulation number:</b>
ECE R48
<b>Subject:</b>
Colour conspicuity marking at the rear
<b>Reference to Annex, etc in the Directive or Regulation:</b>
paragraph 5.15
<b>Text:</b>
For the conspicuity marking at the rear the following colours are mentioned in paragraph 5.15. Red or yellow to the rear <sup>9</sup> As you can see foot note number 9 is applicable to the conspicuity marking at the rear. At foot note 9 the following is mentioned <sup>9</sup> Nothing in this Regulation shall preclude the Contracting Parties applying this Regulation from allowing the use of white conspicuity markings to the rear in their territories.

<b>Question:</b>
Does this foot note allow us to accept also white conspicuity marking at the rear in an ECE R48 certificate or is it only allowed, at an national level, to allow white conspicuity marking at the rear?

<b>Solutions:</b>	
A	White conspicuity marking at the rear can be accepted in an ECE R48 certificate
B	White conspicuity marking at the rear can be accepted in an ECE R48 certificate with a remark that acceptance of the white marking is arranged on national level
C	White conspicuity marking at the rear can only be approved on national level

<b>Decision:</b>		
<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A		X
B	??	??
C	X	

<b>Authority:</b>	
Type approval Authority e/E	4

The meeting supported solution C – White conspicuity marking at the rear can only be approved on national level

**9.7. R 13, paragraph 5.2.1.18. and Annex 10, paragraph 3.1.5.1., Vehicle intended for towing O2 trailers fitted with compressed-air braking systems (Netherlands 8)**

**Questions by the TAAM delegation of the Netherlands  
RDW-TAAM-2014-006**

<b>Directive or Regulation number:</b>
<a href="#">ECE Regulation No. 13</a>
<b>Subject:</b>
Vehicles intended for towing O2 trailers fitted with compressed-air braking systems

<b>Reference to Annex, etc in the Directive or Regulation:</b>
Paragraph 5.2.1.18 and Annex 10, paragraph 3.1.5.1

<b>Text:</b>
<p>Paragraph 5.2.1.18. In the case of a vehicle authorized to tow a trailer of category O3 or O4, its braking systems shall satisfy the following conditions: etc.</p> <p>Annex 10 Paragraph 3.1.5.1. In the case of a power-driven vehicle authorized to tow trailers of category O3 or O4 fitted with a compressed air braking system, the permissible relationship between the braking rate TM/PM and the pressure pm shall lie within the areas shown on diagram 2 of this Annex for all pressures between 20 and 750 kPa.</p>

<b>Question:</b>
Do the requirements for airbrake systems for O3/O4 trailers on towing vehicles also apply to trailer airbrake systems for O2?

<b>Solutions:</b>	
A	Yes. Compressed-air braking systems on towing vehicles for O2 trailers must fulfill the same safety requirements as those applicable to O3 and O4 trailers
B	No. In case of air-braking systems for O2 trailers it is sufficient to fulfill the general requirements, applicable to all trailer categories. There is no need for special guaranties: -in the field of the permissible relationship between the braking rate TM/PM and the pressure pm. -in case the secondary braking system comes into action due to a failure in the service braking systems.

<b>Decision:</b>		
<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A	X	
B		X

**Questions by the TAAM delegation of the Netherlands  
RDW-TAAM-2014-006**

<b>Authority:</b>	
Type approval Authority e/E	<b>E4</b>

<b>Remarks:</b>
<p>In paragraph 5.2.1.18 requirements are defined for trailer braking systems on towing vehicles intended for trailers of category O3/O4. It is accepted that an airbrake system is used on towing vehicles for the control of the service brake of O2 trailers. The requirements according to 5.2.1.15 are applicable, however there is no reference to specific requirements, as is the case for trailer brake systems for O3/O4 trailers. The mass of an O2 trailer can be up to 3.5 tonnes. In particular when the towing vehicle is relatively low in mass, it is important that there is still a possibility of graduated braking of the trailer in the event of a fallback to the secondary braking system of the towing vehicle. In case of an overrun braking system there is a possibility of a graduated braking of the trailer when only the secondary braking system of the towing vehicle is available. Technically there is no obstacle to meet the requirements.</p>

The meeting supported solution A – compressed-air braking systems on towing vehicles for O2 trailers must fulfill the same safety requirements as those applicable to O3 and O4 trailers

**9.8. R 107, The method of measuring the seat spacing between two consecutive seats facing in the same direction (follows up to the Vilnius item 10.6., France 4) (Romania1)**

**Legislation (directive / regulation / etc): [regulation ECE-UN no. 107 rev. 03 \(R107\)](#)**

**R 107:**

Measurement of Dimension „H”, in class A, class B and class I vehicles

LEGISLATION :

7.7.8.4. Seat spacing (see annex 4, figure 12)

7.7.8.4.1. In the case of seats facing in the same direction, the distance between the front of a seat squab and the back of the squab of the seat preceding it (**dimension H**), shall, when measured horizontally and at all heights above the floor between the level of the top surface of the seat cushion and a point 620 mm above the floor, not be less than:

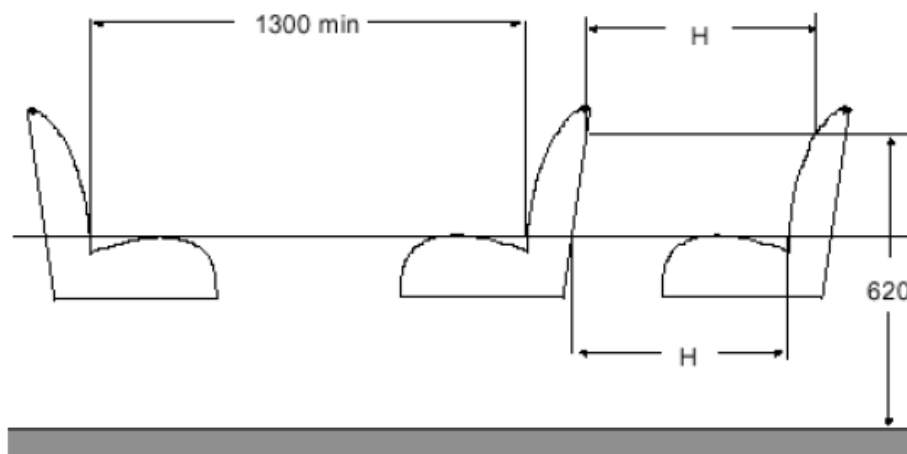
<b>H</b>	
<b>Class I, A and B</b>	<b>650 mm</b>
Class II and III	680 mm

7.7.8.4.2. All measurements shall be taken, with the seat cushion and squab uncompressed, **in a vertical plane passing through the centreline of the individual seating place.**

Figure 12

**SEAT SPACING**

(see annex 3, paragraph 7.7.8.4.)



**Comments:** According to the solution accepted by TAAM at Vilnius 2014 for the issue raised by France, Question 10.6, the back of the seat should **not** have a central recess (sunken area) **to comply** with dimension H requirement. Now we are facing to a situation that evolved. The evolution is related to the width of the sunken area. The seat manufacturer has widened the recess area (from our information the seat presented by France and the seat presented by us is the same type) and the body builders, second stage manufacturers, are guided to install more seats in the same space.

In the attached drawings it can be seen the difference between the two ways of measurements:  
 a) if the measurement starts from the surface of the sunken area it is possible to mount seven rows of seats;  
 b) if the measurement ignores the sunken area the last row will be **outside** of the vehicle.  
 In case a) the number of passenger is 22 and in case b) the number is 19. This kind of vehicles with 19 passengers (pushed to the minimum limit of dimension H, 650 mm) is at the limit of comfort. Increasing the number of seats in the same space will not in the benefit of passengers.

**Question:** it is acceptable to taking into account the sunken area as reference area in order to measure the dimension H ?

	Possibilities of solutions	accepted	refused
A	<b>No</b> , the central recess (sunken area) will no be taking into account in order to comply with dimension H requirement , regardless the width of the area	x	
B	<b>Yes</b> , this measurement complies with the requirement of R107		x



The meeting supported solution A – but B is possible. Romania will ask for answer also at GRSG.

**9.9. R 10.04, Annex 11: Method(s) of testing for emission of harmonics generated on AC power lines from vehicle** (Spain 1)

<b>Directive or Regulation number</b>
UN/ECE R10.04 Electromagnetic compatibility
<b>Subject:</b>
Annex 11: Method(s) of testing for emission of harmonics generated on AC power lines from vehicle

<b>Text:</b>
<p><b>1.2. Test method</b></p> <p>This test is intended to measure the level of harmonics generated by vehicle in configuration ‘RESS charging mode coupled to the power grid’ through its AC power lines in order to ensure it is compatible with residential, commercial and light industrial environments.</p> <p>If not otherwise stated in this annex the test shall be performed according to:</p> <p>(a) IEC 61000-3-2 (edition 3.2 - 2005 + Amd1: 2008 + Amd2: 2009) for input current in charging mode <math>\leq 16</math> A per phase for class A equipment;          (b) IEC 61000-3-12 (edition 1.0 - 2004) for input current in charging mode <math>&gt; 16</math> A and <math>\leq 75</math> A per phase.</p>
<b>Concern:</b>
<p>One of the most concerns in electric vehicles is the autonomy of the battery as well as the time for charging it. In this way, some super-chargers have been developed in order to reduce the charging time of the batteries. To succeed with this issue, the main idea is to increase the input current in charging mode higher than 75 A per phase.</p>

<b>Question:</b>			
How to test the emission of harmonics generated on AC power lines from vehicle when the input current in higher than 75A per phase?			
<b>Solution:</b>		Accepted	Refused
A	As there are no requirements for these charging methods, Annex 11 is not applicable (no tests needed).	X	
B	As there are no requirements for these charging methods, it is not allowed to approve according to ECE R10.04 such kind of vehicles.		X
<b>Authority:</b>			

Question is not entirely appropriate for this meeting. Majority of states have not experience with it. Finally, new solution C has been adopted: test at maximum 75A and write in the remarks that it can be possible to charge at more current input.



**9.10. R 55, Annex 6, item 1, Mechanical coupling components**

(Sweden 1)

SUBJECT: Mechanical coupling components

REGULATION: R55

RELEVANT SECTION: General testing requirements

Annex 6 item 1

Samples of coupling devices shall be tested for both strength and function. Physical testing shall be carried out wherever possible but unless stated otherwise the type approval authority or technical service may waive a physical strength test if the simple design of a component makes a theoretical check possible.

Theoretical checks may be carried out to determine worst case conditions. In all cases, theoretical checks shall ensure the same quality of results as with dynamic or static testing. In cases of doubt it is the results of physical testing that are overriding.

QUESTION/DISCUSSION:

How is “simple design of a component” defined?

Is this possibility to make a theoretical check/calculation often used or is it more common to make physical tests?

We would like to know how other authorities handle this.

Not absolutely clear answers could be given.

The definition of “simple design” - on national level.

Simple calculation should be sufficient in the most cases, if not, the component should be tested.

## 10. Miscellaneous

### 10.1. New software developments. What kind of software is used / developed by other TAA (Belgium 2)

The context of the Belgian TAA is the opportunity to think about new software developments.

So, Belgium would like to know what kind of software are used / developed by / for others TAA.

Some delegates described their national systems for data exchange, approval management, vehicle registrations etc., whereas this topic was also discussed during the coffee break. The question is sort of permanent open matter so the exchange of views will continue.

## 10.2. Market surveillance

**Regulations (EU) no. 167/2013 and no. 168/2013 define “approval authority” and “market surveillance authority”.** (Slovakia)

Could you give us some information about market surveillance authorities in your country?

- Is the market surveillance authority the same authority as the approval authority?
- If the approval authority is not also the surveillance authority, is the market surveillance carried out by one authority or by more authorities?
- is the market surveillance authority according to the Reg. (EU) no. 167/2013 and no 168/2013 the same authority as the market surveillance authority according to Reg. (EU) no. 765/2008?

Special questionnaire was distributed on this topic. The information from various member states was then provided electronically to the delegations concerned.  
Also this theme is “still living” and may be talked over in future.

### 10.3. Update on RMI issue

#### Question N°: NSAI No. 1: Update on RMI issue

(Ireland 1)

Since the last RMI Sub-group meeting (03/04/2014) the Commission contacted our Ministry to inform them that they are pursuing a Pilot Infringement case against Ireland as a result of a complaint they received from GVA in relation to the RMI issue.

As a result, there has been a lot of communication back and forth between the Commission, our Ministry, NSAI etc. This resulted in a meeting on 06/10/2014 in Brussels between the Commission, representatives of our Ministry, and representatives of NSAI.

A number of points resulted from this meeting as follows:

- The RMI issue is a “global” issue and it is not just confined to a difficulty with one approval authority/manufacturer.
- Commission is anxious to work with us to find a quicker and better solution and to outline the next steps to be taken to:
  - o Resolve the Irish pilot infringement case and
  - o The wider global issues attached to the RMI issue.
- Commission believe that this is an attempt by GVA to obtain through legal means what they could not obtain through negotiations of the RMI requirements.
- Commission believe that this is an attempt by GVA to obtain through legal means what they could not obtain through negotiations of the RMI requirements.
- On 20/10/2014 the Commission will be presenting a report on the study of the RMI implementation (Ricardo study) to the Motor Vehicle Working Group meeting.
- The Commission is also preparing a report on the operation of RMI to Parliament for early 2015.
- The Commission have the TAAM meeting minutes of 28 – 29 November 2013 (containing the RMI Sub-group conclusions) but have not read these minutes. As a result they were not aware of the difficulties the approval authorities are experiencing with RMI.
- NSAI went through the RMI Sub-group minutes from both sub-group meetings, including the concerns with 2<sup>nd</sup> stage manufacturers, CEN ISO Standards, with the Commission.
- The Commission were surprised and concerned and expressed a willingness to host a TAAEG meeting on this issue. They are prepared to host the TAAEG meeting at any time.

I think it is important that before this TAAEG meeting takes place, the RMI Sub-group should meet to prepare for this TAAEG. We should use this opportunity to consider all difficulties and to prepare questions and arguments for the Commission to answer and consider. The

Commission have indicated that this will assist them in their report to Parliament in early 2015.

This is also an opportunity for all TAA to send their thoughts and views on this issue to the RMI Sub-group for consideration at this TAAEG.

I can offer the following dates in November for this 3<sup>rd</sup> RMI Sub-group meeting: 18<sup>th</sup>, 19<sup>th</sup>, 20<sup>th</sup> or 25<sup>th</sup>, 26<sup>th</sup>, 27<sup>th</sup>.

If November is too soon after the TAAM we can also organise for December.

I can also offer NSAI in Dublin as a location for this meeting. If this location does not suit then we can go with any other suggestion.

Approval Authority:		<b>e24</b>	
<b>Selection of solution:</b>		<b>Agree</b>	<b>Disagree</b>
<b>Question 1</b>	In favour of TAAEG meeting with Commission ( <i>date to be arranged with the Commission</i> ):	X	
<b>Question 2</b>	In favour of RMI Sub-group meeting prior to TAAEG meeting :	X	

TAAM meeting agreed with both solutions.

## **11. Next TAAM**

Iceland	–	may 2015
France	–	autumn 2015
Finland	–	spring 2016

## **12. Any other business**

No specific points were presented.
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