



RDW



**TYPE APPROVAL AUTHORITIES MEETING**

**21 & 22 NOVEMBER 2011 – GENEVA, SWITZERLAND**

**MINUTES OF THE MEETING**

**Issue Date: 23 November 2011**

**Author:**

## AGENDA

### **1. Opening of the meeting**

### **2. Adoption of the Agenda**

### **3. Adoption of the minutes from Riga, Latvia (12- 13 May 2011)**

### **4. Follow up on actions from the previous meetings**

- 4.1 Riga Agenda item 4.2.; Sibiu Agenda item 4.3.; Sofia Agenda item 5.3 2007/46/EC, Annex II, subparagraph 4.3: Symbol G  
*Switzerland*
- 4.2. Riga Agenda item 4.4.; Sibiu Agenda item 5.14. 2006/40/EC: Mobile Air Conditioning Systems  
*Germany*
- 4.3. Riga Agenda item 4.5.; Sibiu Agenda item 4.5.; Sofia Agenda item 5.7. - 2007/46/EC: CoC – Type of bodywork and wheelbase for single- axle trailers (Germany 3)  
*Sweden*
- 4.4. Riga Agenda item 5.11.; 2007/46/EC, EC715/2007: Repair and Maintenance Information  
*France*
- 4.5. Riga Agenda item 5.12. 2007/46/EC, EC715/2007: Framework directive 2007/46/EC – CoP measures and CO2 responsibilities  
*Germany*
- 4.6. Riga Agenda item 5.13.; EC183/2011: Individual approval of category M1 and N1  
*Lithuania*
- 4.7. Riga Agenda item 5.22. ECE R107, ECE R13: EC braking and carriage of passengers  
*France*
- 4.8. Riga Agenda item 5.24.ECE R13: R13 test reports according annexes 19-21  
*Germany*

### **5. Items relating to Framework Directive 2007/46/EC (Motor Vehicles)**

- 5.1 Directive 2007/46/EC: Application of article 32, recall of vehicles  
*France 1*
- 5.2 Regulation 385/2009: Type 1 Test Results in COC  
*Austria 1*
- 5.3 Regulation (EC) 715/2007 together with Reg. (EC) 692/2008  
*Germany 2*
- 5.4 Commission Regulation (EU) No 566/2011 monitoring of the particulate trap  
*NL 2*
- 5.5 UN R 103 and (EC) 715/2007: Replacement pollution control devices, Particulate filters Provisions for testing  
*Germany 1*
- 5.6 715/2007/EC and UN Regulation 83.06: Engine setting for Type I test  
*UK2*
- 5.7 ECE R48.04 supplement 6: installation of lighting and light-signalling devices  
*NL 1*
- 5.8 UN Regulations 48.05 and 45.01: Activation of headlamp washers  
*UK3*
- 5.9 UN Regulation 48.05: Rear lamps on movable components  
*UK4*
- 5.10 2007/35/EC amending Council Directive 76/756/EEC  
*NL 3*
- 5.11 Directive 97/27/EC: Registration masses  
*France 2*
- 5.12 Directive 97/27/EC: Vehicle Width  
*Slovakia 1*
- 5.14 77/649/EEC and UN Regulation 125: Forward vision  
*UK1*
- 5.15 92/114/EEC: Exterior projections of cabs (N Category)  
*UK5*
- 5.16 TAAM Queries circulated by KBA: results  
*Germany 5*

## **6. Items relating to Framework Directive 2002/24/EC (Motor Cycles)**

6.1. 2002/24/EC and UN-ECE Regulation 10 or 97/24/EEC, Chapter 8 *Germany 4*

## **7. Items relating to Framework Directive 2003/37/EC (Agricultural and Forestry Tractors)**

7.1 Directive 2009/144/EC: certain components and characteristics of wheeled agricultural or forestry tractors *Estonia 1*

7.2 Directive 2000/25/EC, Article 3a, Flexibility Scheme *Romania 1*

## **8. Miscellaneous**

8.1. Short report of the ETAES-Meeting *Germany*

8.2. Adoption of the report of the Multi-Stage Subgroup *Germany*

8.3 GSR Subgroup Issues

8.3.1 Short report of the GSR sub group, including the progress at the Commission *UK*

8.3.2 Riga Agenda item 5.10. 2007/46/EC, EC661/2009: Numbering of GSR approvals *NL*

8.3.3 Riga Agenda item 5.18.; EC661/2009: Definition of “New type of vehicle” AEBS/LDWS *Spain*

8.3.4 GSR subgroup meeting in Flensburg 2012 *Germany*

## **9. Future Meetings**

9.1. Joint approach from the United Kingdom, Germany and Netherlands on the organisation of TAAM.

*Germany,  
UK and the  
Netherlands*

9.2. 2012 Q1/Q2

9.3. 2012 Q3/Q4

9.4. Future direction for TAAM

## MEETING QUESTIONS AND NOTES

### 1. Opening of the meeting

#### TAAM Minutes:

Since there had been no volunteers to host a TAAM in Q3/Q4 2011, delegates from Germany, Netherlands and the UK agreed to jointly organise this meeting in order to protect the continuity of the TAAM.

The meeting was therefore chaired by (Germany) and the secretarial support was provided by (NL) and (UK).

welcomed the delegates to Geneva and thanked the United Nations staff for their considerable help in providing the meeting room in the Palais des Nation and for facilitating administration of the registration arrangements.

The secretariat of TAAM circulated a standard e-mail list that could be used for circulation of TAAM documents. This list can also contain addresses of other persons than those participating in TAAM. The list was corrected by the delegates and can be used for future meetings.

As new participants are present all attendees briefly introduced themselves.

### 2. Adoption of the Agenda

#### TAAM Minutes:

The proposed meeting Agenda was accepted as presented with the addition of two items as follows:

Agenda Item 7.2.: Directive 2000/25/EC, Article 3a, Flexibility Scheme – Romania 1

Agenda Item 9.4.: Future direction for TAAM

### **3. Adoption of the minutes from the TAAM held in Riga, Latvia on 12-13 May 2011**

#### **TAAM Minutes:**

**The chairman thanked the representative from Latvia for the perfect organisation of the previous meeting in Riga on 12 and 13 May 2011. The Latvia TAAM report was approved without any amendments.**

**The Geneva meeting secretariat agreed to confirm the arrangements for uploading the TAAM Riga minutes onto the Commission website.**

**The meeting accepted a proposal from France that a summary document is also prepared to highlight the key action points arising from the TAAM minutes.**

#### 4. FOLLOW UP ON ACTIONS FROM THE PREVIOUS MEETING

4.1. Riga Agenda item 4.2.; Sibiu Agenda item 4.3.; Sofia Agenda item 5.3 2007/46/EC, Annex II, subparagraph 4.3: Symbol G *Switzerland*

##### **BACKGROUND**

One of the conditions mentioned in directive 2007/46/EC (annex II, subparagraph 4.3) for classification of a lorry (category N<sub>3</sub>) as an off-road vehicle is that all wheels can be driven simultaneously. Recently more and more vehicles with auxiliary drive (for instance hydrostatical front wheel drive) have been put on the market. Some manufacturers count these vehicles as all-wheel drive vehicles, though the auxiliary drives are often limited in speed and torque.

*Wording of directive 2007/46/EC, annex II, subparagraph 4.3:*

*4.3. Vehicles in category M3 with a maximum mass exceeding 12 tonnes or in category N3 are to be considered to be off-road vehicles either if the wheels are designed to be driven simultaneously, including vehicles where the drive to one axle can be disengaged, or if the following requirements are satisfied: .....*

##### **Major Concern**

Considering that directive 2007/46/EC, annex II, subparagraph 4.3 doesn't say anything about neither a minimum torque nor a minimum speed of a drive wheel, we fear that manufacturers of vehicles with very weak or very slow auxiliary drives (or even token auxiliary drives) could demand to classify their vehicles as off-road vehicles in the sense of the directive in order to obtain the associated facilitations and advantages.

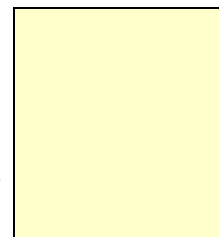
##### **Questions:**

1.) 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?

**Answer:**

A) We think that wheels propelled by an auxiliary drive should always be considered to be drive wheels.

B) We support the idea that weak and slow auxiliary drive wheels can only be counted as drive wheels when certain minimal requirements are met.




2.) In case you have chosen answer B, do you support adding a corresponding detailed definition in directive 2007/46/EC?

**Answer:**

A) yes

B) no



Minutes from Riga TAAM:

It was noted that there had not yet been a response from the Commission and, furthermore, this issue is not addressed by the draft text for amending Annex 2 of 2007/46/EC.

There was some concern that manufacturers might present 'artificial' specifications to avoid some specific legislative requirements and it was agreed that this item should be referred to the next Type Approval Authorities Experts Group meeting (to be held on 6 June 2011).

In the meantime, it was agreed that the Authorities should deal with this issue on a case by case basis.

**TAAM Minutes:**

**It was agreed that, because this item has been transferred to the TAAEG, it can now be removed from the TAAM agenda.**

**This question has been discussed in the TAAEG meeting of 6 June 2011, and it was agreed that the TAAM secretariate would forward the report by e-mail to the TAAM delegates. For information, the TAAEG report concluded as follows for this item:**

*FR requested further information in what regards hybrid vehicles, notably how to become off road. LV referred that TAA should proceed on a case by case basis.*

*The Chair concluded that additional information will be provided when necessary.*

**4.2. Riga Agenda item 4.4.; Sibiu Agenda item 5.14. 2006/40/EC: Mobile Air Conditioning Systems** *Germany*

**Issue**

With effect from 1 January 2011 Member States shall no longer grant EC type-approval or national type-approval for a type of vehicle fitted with an air conditioning system designed to contain fluorinated greenhouse gases with a global warming potential (GWP) higher than 150.

The anticipated new refrigerant with a GWP < 150 is R-1234yF.

The directive 2006/40/EC has apart from the GWP no requirements for the refrigerant. The new refrigerant is under discussion in Germany because of the chemical characteristics (flammability, potential outcome of hydrofluoric acid in case of fire).

With regard to the refrigerant and to the type-approval process there are some open points to discuss:

**Question:**

1. There are no technical requirements for air conditioning systems or components with a **GWP < 150** (e.g. no leakage rate). Is a type-approval still necessary for such systems or components?
2. Is there a discussion in your country about the risks of R-1234yF?
3. Will you take into account the possible risks by the refrigerant R-1234yF when granting a system approval or a whole vehicle type-approval?

**Prescription**

Directive 2006/40/EC and Regulation (EC) No 706/2007.

**Possibilities of solution**

**Comments**

A	Yes, a type-approval of the system is still necessary	It's a type-approval without technical requirements (the manufacturer shall deliver only the information document to the approval authority)
B	No, an approval of the system is not necessary.	
C	Yes, a type-approval of components is still possible	There are no requirements in the directive and regulation.
D	No, a type-approval of components is not longer possible.	

**Minutes from Riga TAAM:**

The German delegation reported that the assessment of manufacturer's measures against potential risks associated with the use of new refrigerant HFO-1234yf (2,3,3,3-Tetrafluoropropene) is ongoing.

Question is reported to next TAAM pending the outcome of the assessment.



**TAAM Minutes:**

Germany stressed the risk of the new refrigerant HFO-1234yf in case the fluid comes into contact with hot surfaces or get on fire. Therefore, for type approval, Germany requires that the manufacturer declares that the vehicle fulfils ISO 13043 or equivalent provisions. Furthermore, vehicles not complying with ISO 13043 may be refused registration in Germany according Article 29 of Directive 2007/46/EC

Many of the TAAM delegates held the view that, unless the EU Type Approval legislation includes specific requirements for manufacturers to comply with ISO 13043, they would not be able to mandate the ISO 13043 provisions as a condition for issuing an approval according to Directive 2006/40/EC and EC Regulation 706/2007.

The meeting recognised that this issue can be considered to be one that is essentially related to the administration of vehicle registrations in Germany.

Germany also reminded the delegates that according to the agreement in the previous TAAM the letter B has to be added to the type approval number of approvals containing the new refrigerant.

**4.3. Riga Agenda item 4.5.; Sibiu Agenda item 4.5.; Sofia Agenda item 5.7.  
2007/46/EC: CoC-Type of bodywork and wheelbase for single axle trailers (Germany 3)  
*Sweden***

The Swedish Registration Centre has quite a lot of problems with this issue.  
We have not received any information if Part B in the Sofia 5.7 question (the question is included on page 2) has been handled in the Masses and dimensions subgroup of TCMV.  
Has this item been handled in the TCMV? Does any MS have more information in this matter?

Minutes from Riga TAAM:

In order to avoid possible confusion arising from an uncertainty concerning the definition of the wheelbase given in Annex I of the Directive 2007/46/EC and the data required on the CoC, this item should be referred to the next Type Approval Authorities Experts Group meeting (to be held on 6 June 2011).

**TAAM Minutes:**

**Sweden has now received information and clarification on this topic and it was confirmed that this point can be deleted from the agenda.**

**4.4. Riga Agenda item 5.11.; 2007/46/EC, EC715/2007: Repair and Maintenance Information**

*France*

- Regulation number :
  - Regulation 715/2007 amended EC/692/2008 of the European Parliament and of the Council of 20 June 2007 on type approval of motor vehicles with respect to emissions from light passenger and commercial vehicles (Euro 5 and Euro 6) and on access to vehicle repair and maintenance information.
  - Directive 2007/46/EC establishing a framework for the approval of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles.
- Text of Directive 2007/46/EC

1.1 ANNEX XI - appendix 1

[...]

*item 2a* : Emissions (Euro 5 and 6) light-duty vehicles / access to information for M1 with Technically permissible maximum laden mass > 2500 Kg and M2, requirement G + Q which :

G means : Requirements according to the category of the base/incomplete vehicle (the chassis of which was used to build the special purpose vehicle). In the case of incomplete/completed vehicles, it is acceptable that the requirements for vehicles of the corresponding category N (based on max. mass) are satisfied.

Q means : Modification of exhaust system length after the last silencer not exceeding 2 m is permissible without any further test. An EC type-approval issued to the most representative base vehicle remains valid irrespective of change in the reference weight.

• **Text of Regulation 715/2007**

1.2 Chapter III : access to vehicle repair and maintenance information

Article 6

Manufacturers' obligations

1. Manufacturers shall provide unrestricted and standardised access to vehicle repair and maintenance information to ...

- Issue
    - Special purpose vehicles of appendix 1 are built in 2 steps based on application of the provisions of Annex XI, appendix 1 of directive 2007/46.
- In particular, in application of the letter Q, the first stage approval of requirements of item 2a (emissions) can be used for the 2nd stage, without further testing (if the engine is not changed).

**In this case, no test and separate approval according to regulation 715/2007 is made for the 2nd stage manufacturer.**

However, the requirements for access to vehicle repair and maintenance information are called by regulation 715/2007 amended 692/2008.

**Question 1** : Without test or approval on 715/2007, are these 2nd stage manufacturers of SPV (appendix 1) subject to the requirements of access to vehicle repair and maintenance information ?

- Same approach for the 2<sup>nd</sup> stage manufacturers who do not have to make another approval on emissions 715/2007 (because the completed vehicle comply to the first stage approval) for example, a bodybuilder putting a box or a tipper on a first stage chassis-cab, complying

with in the reference mass of the first stage approval.

**Question 2** : Without test or approval on 715/2007, are these 2nd stage manufacturers subject to the requirements of access to vehicle repair and maintenance information ?

**Possibilities of solution**

**Comments**

Question 1 :

	A	Yes, These manufacturers have to comply to access to vehicle repair and maintenance information.	If yes, which procedure is used ?
	B	No, These manufacturers do not have to comply to access to vehicle repair and maintenance information.	There is no test nor approval regarding regulation 715/2007 (application of letter Q)
	C	Other solution	

Question 2 :

	A	Yes, These manufacturers have to comply to access to vehicle repair and maintenance information.	If yes, which procedure is used ?
	B	No, These manufacturers do not have to comply to access to vehicle repair and maintenance information.	There is no test nor approval regarding regulation 715/2007 (the 1 <sup>st</sup> stage approval can be used)
	C	Other solution	

Minutes from Riga TAAM:

Noting that the repair and maintenance provisions of 715/2007/EC are not restricted to just emissions related items, the meeting decided to refer this item to the next Type Approval Authorities Experts Group meeting (to be held on 6 June 2011).

**TAAM Minutes:**

**France reported that the Commission has indicated that a review of the framework Directive 2007/46/EC will pay special attention to the RMI for multistage built vehicles and vehicles for special purposes. This topic will therefore be deleted from the TAAM agenda.**

**In the mean-time, the manufactures should still be required to give the website address for RMI during type approval. However, it was noted that further action by the approval authority would only be needed when there are specific complaints from independent repairers/operators.**

**Issue**

- a) Regulation (EC) 715/2007 (referring to UNECE R101) and the directive 80/1268/EEC are taking care of the CO<sub>2</sub> measurement. Until now the vehicle manufacturer states the Co<sub>2</sub> value without having to fulfil any limit values. The new Regulation (EC) 443/2009 sets target values for the vehicle fleet and provide fines/sanctions (*excess emissions premium*) for not reaching the CO<sub>2</sub> objectives (M1 130g...). For checking of the CoP concerning the emission of CO<sub>2</sub> as stated by the manufacturer there might be different approaches. There are cases where not only the approval authority which granted the approval but also other MS-TAA are visiting the factories to check the CO<sub>2</sub> values and actually carry out CO<sub>2</sub>-CoP. Which MS-TAA is responsible for exercising the CoP on the manufacturers plant? Is it allowed for a TAA which didn't grant the approval to do on site visits and check CoP?
- b) Today the manufacturer is stating the CO<sub>2</sub> value. He has to apply the above mentioned regulation or directive. Since no limit values have to be fulfilled until now to get an approval for CO<sub>2</sub> emissions, the directive and regulation seem to provide not completely clear provisions regarding the type-approval and CoP.

**Question:**

- 1. Who has to carry out the CoP checking?
- 2. Is it necessary to provide new and more clearer definitions and provisions concerning CO<sub>2</sub> emissions? And therefore to amend the (EC) 715/2007 especially for the CoP measures?

Possibilities of solution

comments

a	1	The TAA which granted the system approval?	This provides a clear responsibility and is in line with the 'normal' CoP approach.
	2	The TAA which granted the WVTAs?	There might be also a responsibility regarding the new Reg. (EC) 443/2009.
	3	Other TAA may also carry out CoP.	
b	1	Yes	It is necessary to amend the legislation.
	2	No	All the provisions for TA and CoP are clear enough and an amendment is not necessary.

Minutes from Riga TAAM:

The meeting agreed on the solution a1 which means that mainly Type Approval Authority which has granted the system approval is responsible for CoP. Type Approval Authority which has granted the WVTA may also carry out the CoP, therefore solution a2 can be accepted.

There was a split view regarding Question 2. The major part of the meeting was in favour of the solution b2, but recognising that any change to the legislation had to be channelled through the appropriate working group (MVEG). It was agreed that those interested in amending the legislation (Germany, France and Spain) should prepare a proposal for consideration at the next TAAM prior to submission to the working group.

**TAAM Minutes:**

**It was already concluded that the CoP has to be performed by the approval authority that has granted the system approval.**

**Pending the planned review of 2007/46/EC, no action is needed for improving the CO2 legislation for type approval and CoP.**

**The topic will now be deleted from the TAAM agenda.**

#### 4.6. Riga Agenda item 5.13.; EC183/2011: Individual approval of category M1 and N1

Lithuania

##### Issue

Regulation (EC) No 183/2011 prescribes requirements for the approval pursuant to Article 24 of complete vehicles belonging to category M1 and N1, produced in large series in or for third countries

##### Legislation:

Regulation (EC) No 183/2011

Appendix 2

*"Requirements for the approval pursuant to Article 24 of complete vehicles belonging to category M 1 and N 1 , produced in large series in or for third countries"*

##### **0. OBJECTIVE**

*A vehicle is deemed to be new where:*

*(a) it has never been registered previously; or*

*(b) it has been registered for less than 6 months at the time of the application for individual approval.*

*A vehicle shall be considered registered where it has obtained a permanent, temporary or short-term administrative authorization for entry into service in road traffic, involving its identification and the issuing of a registration number<sup>(1)</sup>.*

Question: Is this regulation mandatory to small series production or homemade vehicles?

##### Possibilities of solution

##### Comments

	<u>Possibilities of solution</u>	<u>Comments</u>
	Yes	The requirements should be applied.
<b>B</b>	No	This area is not an objective this regulation.
<b>C</b>	Other	

##### **Other opinion / comment:**

This regulation will introduce new definitions on new or used vehicles. How should these definitions be interpreted?

Situation: Vehicle was temporary registered in one of EU countries and has temporary documents. After 6 or more months vehicle owner comes to registration institution and wants to register the vehicle. Which registration should be issued: temporary or normal as this vehicle has been identified as used and has been already registered in EU?

##### Minutes from Riga TAAM:

The meeting agreed that requirements of the Regulation (EC) No 183/2011 apply to the vehicles of categories M1 and N1, produced in large series in or for third countries. Member States can choose to apply those requirements to small series production or homemade vehicles. The meeting supported Solution B.

Lithuania will prepare the question for the next TAAM related to the comment above – what kind and what term of the registration is to be determined in order to treat a vehicle as new or used in accordance with the requirements of the Regulation (EC) No 183/2011.

**TAAM Minutes:**

**Lithuania indicated that it can support the conclusion of the Riga meeting so that the second sentence of that report on this topic can be deleted. Therefore, no further discussion is needed.**



4.7. Riga Agenda item 5.22. ECE R107, ECE R13: EC braking and carriage of passengers France

- **Regulation number:**
  - **Regulation ECE107 relating to the uniform provisions concerning the approval of category M2 or M3 vehicles with regard to their general construction**
  - Regulation ECE13 relating to the to the uniform provisions concerning the approval of category M, N and O with regard to braking
- **Text of the ECE107 regulation**

1.3 Annex 3

7.6.5.1

In the event of an emergency, every power-operated service door shall be capable, when the vehicle is stationary or driving at a speed less than or equal to 5 km/h, of being opened from inside and, when not locked, from outside by controls which, whether or not the power supply is operating

[...]

7.6.5.8

A starting prevention device, if fitted, shall be effective only at speeds of less than 5 km/h and shall be incapable of operation above that speed.

[...]

- Issue

**The ECE13 regulation only allows braking devices to be operated by the driver. Nevertheless, ECE107 regulation allows starting prevention device effective at speeds of less than 5km/h, which is often linked to the braking system. Consequently, if a bus (or a coach) is driving at a speed less than 5km/h and someone is activating the emergency opening of the door, the bus (or the coach) will brake. Is this starting prevention device (linked to the braking system) in the scope of the ECE13 regulation or is there a contradiction between ECE107 and ECE13 ?**

**Possibilities of solution**

**Comments**

	<b><u>Possibilities of solution</u></b>	<b><u>Comments</u></b>
A	No, the starting protective device is not in the scope of the ECE13	
B	Yes, this starting protective device shall be covered by an ECE13 certificate Nevertheless, even there is a contradiction between ECE13 and ECE107, the fact that anyone could “brake” the bus (or the coach) is acceptable since the speed of the vehicle is always less than 5km/h	
C	Yes, there is a contradiction between ECE13 and ECE107 : no decision can be here taken	

Minutes from Riga TAAM:

Whilst noting that the starting protection device would not necessarily have to involve the vehicle's braking system (it could be achieved by engine throttle control, for example), the meeting expressed concern that a system that did use the vehicle's brakes could result in a situation whereby a passenger could effectively override the driver and "apply" the vehicle's brakes by opening the service door.

The meeting was unable to reach a conclusion and it was agreed that advice should be sought from the UN ECE Working Party on Brakes and Running Gear (GRRF) and that this item should then be discussed again at the next TAAM.

**TAAM Minutes:**

**GRSG has agreed to an amendment of UN regulation 107 on the starting prevention device and hence this question can now be deleted from the agenda.**

**Issue**

The UNECE-R 13 defines:

The application for approval of a vehicle type with regard to braking shall be submitted by the vehicle manufacturer or by his duly accredited representative.

**A component approval or partial system approval is not possible according to the Regulation.**

The Regulation allows in some cases alternative procedures for type approving vehicles, utilizing information from test reports issued to brake component or system suppliers (e.g. Annex 11, 19 and 20).

This test reports (for e.g. Trailer anti-lock braking system, Vehicle stability function simulation tools, Vehicle stability function, spring brakes) should be signed by the Technical Service and by the TAA.

This test reports can be used directly by the vehicle manufacturers for the type-approval of the vehicles.

In the past, the KBA signed a lot of reports for braking systems and components for trailers. But these reports are not used for type-approval (at least not in Germany). This will be changed with the obligatory type-approval for trailers and heavy duty motor vehicles.

The R-13 defines no administrative requirements for the approval authority with regard to these reports.

Question:

1. (How) do you check the report (as a normal report in the type-approval procedure)?
2. Do you perform an initial assessment / COP before you sign the report?
3. Do you accept such kind of reports (issued from another TAA) without any additional checks for type-approval?
4. How could the vehicle manufacturer be responsible for the whole vehicle brake if he uses reports delivered by the suppliers without special suitable arrangements with the supplier?
5. Could this procedure be used in the future for ESC-Systems for motor vehicles, too (a first proposal for this was discussed in the GRRF – the vehicle manufacturer have some doubts) ?

The KBA has serious doubts that the approvals based on this reports are in all cases sound without clear administrative provisions.

**Possible solution:**

Amendment of the UNECE-R 13 as follows:

1. Delete the signature of the TAA in the test reports
2. Delete the unimportant test reports (e.g. spring brakes)
3. Define clear responsibilities for the whole procedure and for all documents and reports (vehicle manufacturer)
4. Require suitable arrangements between the vehicle manufacturer and supplier, when the supplier delivers test reports together with the components and systems which should be used for type-approval
5. Check of the whole documentation and of all test reports by the TAA when granting the brake approval of the vehicle.

Minutes from Riga TAAM:

Noting that any proposed amendments to ECE R13 would be processed via the UN ECE Working Party on Brakes and Running Gear (GRRF), the meeting discussed the five questions and agreed to send post-meeting responses to Germany.

**TAAM Minutes:**

**It was explained that GRRF has tabled a proposal for the last WP.29 on the use of test report for the last WP.29 and an additional document from Germany has also been adopted by the TCMV. Nevertheless, WP.29 decided to send the document back to GRRF for improvement of the formulation. This means that the question will remain on the TAAM agenda.**

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

**5.1. Directive 2007/46/EC: Application of article 32, recall of vehicles**

*France 1*

- Regulation number :
  - Directive 2007/46/EC establishing a framework for the approval of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles.
- Text of Directive 2007/46/EC

**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.

**Issue**

Article 32 of 2007/46 states that a manufacturer , starting a recall procedure for a vehicle, shall inform immediately the approval authority that granted the vehicle approval.

Question :

In application of article 32 of Framework Directive, do manufacturers, to whom you have granted European whole vehicle type approval, inform you (TAA) on their recall's program they have to implement ?

If yes, by which method or mean ?

**Possibilities of solution**

**Comments**

	<b><u>Possibilities of solution</u></b>	<b><u>Comments</u></b>
A1	Yes, manufacturers inform us directly	
A2	The method use is :	(e-mail, letter, Rapex...)
B	No, manufacturers don't inform us	

France would like to have a round-table on this question if possible.

**TAAM Minutes:**

**France requested all delegates to give information on how they perform recalls and which means of communication is used. The results of a tour de table were that all manufactures give information and that there is a difference in case of serious risks according the formulation of article 32 of 2007/46/EC. All kinds of communications can be used, including email, letter, fax, RAPEX and ETAES.**

**Background:**

Point 48 of the COC's for categories M and N reads:

“48. Exhaust emissions ( m ):

Number of the base regulatory act and latest amending regulatory act applicable:

.....

1.1. test procedure: Type I or ESC ( <sup>1</sup> )

CO: ..... HC: ..... NO x : ..... HC + NO x : ..... Particulates: .....

Smoke opacity (ELR): ..... (m<sup>-1</sup>)

1.2. test procedure: Type I (Euro 5 or 6 ( <sup>1</sup> ))

CO: ..... THC: ..... NMHC: ..... NO x : ..... THC + NO x : ..... Particulates (mass): ..... Particles (number): .....

2. test procedure: ETC (if applicable)

CO: ..... NO x : ..... NMHC: ..... THC: ..... CH 4 : ..... Particulates: .....”

Some manufacturers indicate the (higher) values of Type 5 test instead of Type 1 test results using the deterioration factors. At least one TAA supports this higher values in the COC. This leads to higher emission values in the emission statistics of some MS.

**Question:**

Shall Type 1 or Type 5 emissions be indicated on the COC?

Possibilities of solution

**A:** Type 1 test results shall be indicated on the COC

**B:** Type 5 test results shall be indicated on the COC

**C:** The manufacturer may choose one of these tests on the COC.

**TAAM Minutes:**

**The meeting agreed with Solution A, noting that the Type I results quoted in both the CoC and Annex VIII of the vehicle approval documentation should be inclusive of the Deterioration Factor and also, when applicable, the Ki factor.**

The KBA was asked to clarify with the other TAA whether Multistage Mobilehomes have to state in the last stage a CO<sub>2</sub> value in Annex VII and/or the CoC.

Annex XI, Appendix 1, of directive 2007/46/EC No. 2a states for M1 vehicles > 2500 kg the letters G + Q. G means, that the provisions of the base vehicle are applicable. According to Annex IV, No. 2a of 2007/46/EG the Reg. (EC) Nr. 715/2007 is applicable for vehicles of category N<sub>1</sub> und N<sub>2</sub>. (See footnote 9 )

Issue and Question:

1. Have the CO<sub>2</sub>-values to be measured and stated in the approval of the last stage?
2. Have CO<sub>2</sub>-Werte to be filled in the CoC after the measurement?

Prescription

Regulation (EC) 715/2007

Possibilities of solution

Comments

<b>A</b>	<b>Yes</b> , the CO <sub>2</sub> -values to be measured and stated in the Annex VII as test results and additionally filled in the CoC of the last stage.	This will reduce the possibilities of errors and will simplify the registration process. It also takes care of the CO <sub>2</sub> Monitoring .
<b>B</b>	<b>No</b> , it is not necessary to measure the CO <sub>2</sub> -values nor to fill them into the CoC of the last stage.	A statement of these values only for the base vehicle is not sufficient for the registration process.
<b>C</b>	Only one CoC needs this value	

**TAAM Minutes:**

**It was concluded that, under the provisions of 2007/46/EC Annex XI, Appendix 1, Item 39, the directive on CO<sub>2</sub> emissions does not apply to motor caravans and that no value should be given to these vehicles.**



**5.4. Commission Regulation (EU) No 566/2011 monitoring of the particulate trap**

*Netherlands 2*

Issue : Paragraph 2.14. of Annex XI reads:  
*As from 1 September 2011, in deviation from point 3.3.5 of Annex 11 to UN/ECE Regulation No 83, a particulate trap, where fitted as a separate unit or integrated into a combined emission control device, shall always be monitored at least for total failure or removal if the latter resulted in exceeding the applicable emission limits. It shall also be monitored for any failure that would result in exceeding the applicable OBD threshold limits*

Question : In the Commission Regulation (EU) No. 566/2011 it is not indicated to what vehicles this requirement has to be applied from 1 September 2011

Solutions	A	From 1 September 2011 all vehicle types (new and existing) must meet this requirement	
	B	From 1 September 2011 all new vehicles that will be registered after this date must meet this requirement	
	C	From 1 September 2011 only new vehicle types (new vehicle types according to Regulation (EC) 715/2007) must meet this requirement	
	D	other	

**TAAM Minutes:**

**It was concluded that monitoring is only required for new type approvals. The meeting therefore agreed with Solution C.**

**5.5. UN R 103 and (EC) 715/2007: Replacement pollution control devices, Particulate filters Provisions for testing**

*Germany 1*

**Issue**

UN R103 formerly has taken care about replacement catalysers. Typically the original device could be exchanged in the lifetime of a vehicle by a non original one approved under the UN R103 or EC 70/220/EEC approved one.

Since modern cars now have (not only the Diesel ones!) also particulate filters (PF)/trap as a part of their emission control strategy, also the PF have to be replaced after years of usage.

The old version of the UN R103 did not have any provisions for testing nor the R 83 which is the standard reference for testing inside the R 103.

The new version is now clear in the view of PF. There are clear provisions related to the procedures in R 83 to test e.g. the regeneration and find the KI-factors (see annex part of R 103 and R83)

The KBA wants to focus on the existing provisions which have to be fulfilled while granting an approval for such devices which now are included in the scope and referenced in the new title of the Reg.

The above said is also applicable for approvals under the 715/2007 umbrella.

**Question:**

Is it possible to give an approval under the UN R 103 to replacement particulate traps without testing in accordance to UN R83 the particulate filter-ability?

**Prescription**

**715/2007 and UN R103 with provisions of R 83**

**Possibilities of solution**

**comments**

1	No	It is not possible to approve an PF without testing the filter ability (KI, Regeneration..) and only test it's catalyser function.
2	Yes	The filter might be seen as a catalyser and therefore is solely tested under the old simple provisions.

## **5. Requirements**

### 5.1. General requirements

5.1.1. The replacement pollution control device shall be designed, constructed and capable of being mounted so as to enable the vehicle to comply with the **provisions of those Regulations which it was originally in compliance with** and that pollutant emissions are effectively limited throughout the normal life of the vehicle under normal conditions of use.

5.1.2. The installation of the replacement pollution control device shall be at the exact position of the original pollution control device, and the position on the exhaust line of the oxygen probe(s) and other sensors, if applicable, shall not be modified.

.....

5.1.3. If the original equipment pollution control device includes thermal protections, the replacement pollution control device shall include equivalent protections.

5.1.4. The replacement pollution control device shall be durable, that is designed, constructed and capable of being mounted so that reasonable resistance to the corrosion and oxidation phenomena to which it is exposed is obtained, having regard to the conditions of use of the vehicle.

### 5.2. Requirements regarding emissions

The vehicle(s) indicated in paragraph 3.3.1. of this Regulation, equipped with a replacement pollution control device of the type for which approval is requested, shall be **subjected to a type I test under the conditions described in the corresponding annexes of Regulation No. 83 in order to compare its performance with the original pollution control device** according to the procedure described below.

### **TAAM Minutes:**

**It was noted that this could depend on the approval level of the vehicle for which the replacement pollution control device is being approved and, in this context, there needs to be a distinction between Euro 4 and Euro 5.**

**The French delegation agreed to progress this via GRPE.**

**BACKGROUND**

In describing the test procedure for a Type I light duty emissions test, ECE R83.06 Annex 4a paragraph 3.2.4 states that the settings of the engine and of the vehicle's controls shall be those prescribed by the manufacturer. This requirement also applies, in particular, to the settings for idling (rotation speed and carbon monoxide content of the exhaust gases), for the cold start device and for the exhaust gas cleaning system.

**DISCUSSION**

Electronic engine management systems provide manufacturers with opportunities to have more than one engine setting/fuel map available in the same engine. These setting can sometimes be changed by the driver during vehicle operation and, for example, there could be an economy setting, a normal setting and a sports setting.

The legislation does not clearly state the criteria by which the Type Approval authority may judge the validity of the engine settings 'prescribed by the manufacturer' for the Type I test and there is a concern that, to give good emissions/fuel consumption results, a manufacturer could specify a special setting that is not normally used for everyday driving.

To overcome this concern, VCA currently adopts the following approach:

- The engine setting used for the Type 1 test should be the key-on default setting for the vehicle.
- If there is no default setting (e.g. at key-on the engine uses the setting that was in operation at the previous key-off), then the emissions test should be tested in the setting that covers the worst case condition

However, we recognise that the legislation is open to interpretation and we would therefore appreciate the views of the other TAAM delegates.

**QUESTION**

What criteria should be used to agree the engine settings used for the Type I test?

**Possibilities of solution****Comments**

<b>A</b>	The vehicle manufacturer is completely free to select the setting to be used for the Type I test	This could mean that the test is conducted with a setting that is not normally used for everyday driving
<b>B</b>	The engine setting used for the Type 1 test should be the key-on default setting for the vehicle.	This helps to encourage the driver to use the most enviromentally beneficial setting
<b>C</b>	If there is no default setting (e.g. at key-on the engine uses the setting that was in operation at the last key-off), then the emissions test should be tested in the setting that covers the worst case condition	

## **LEGISLATION**

### **R83 Annex 4a**

#### **3.2. TEST VEHICLE**

- 3.2.1. *The vehicle shall be presented in good mechanical condition. It shall have been run-in and driven at least 3,000 km before the test.*
- 3.2.2. *The exhaust device shall not exhibit any leak likely to reduce the quantity of gas collected, which quantity shall be that emerging from the engine.*
- 3.2.3. *The tightness of the intake system may be checked to ensure that carburation is not affected by an accidental intake of air.*
- 3.2.4. ***The settings of the engine and of the vehicle's controls shall be those prescribed by the manufacturer. This requirement also applies, in particular, to the settings for idling (rotation speed and carbon monoxide content of the exhaust gases), for the cold start device and for the exhaust gas cleaning system.***
- 3.2.5. *The vehicle to be tested, or an equivalent vehicle, shall be fitted, if necessary, with a device to permit the measurement of the characteristic parameters necessary for chassis dynamometer setting, in conformity with paragraph 5. of this annex.*
- 3.2.6. *The technical service responsible for the tests may verify that the vehicle's performance conforms to that stated by the manufacturer, that it can be used for normal driving and, more particularly, that it is capable of starting when cold and when hot.*

### **TAAM Minutes:**

**The general opinion of the meeting was that, for type approval purposes, emissions results should, in principle, represent the worst case. The UK delegation agreed to request its representative at the GRPE to raise this question for further guidance .**

**Pending the outcome of the GRPE discussions, the majority of the meeting was in favour of following Solutions B and C with the condition that, even when a default setting is available, the Approval Authority must still be satisfied that it represents a realistic in-use setting for the vehicle.**

**It should be noted that at least one delegation was in favour of only Solution C for all cases.**

5.7. ECE R48.04 supplement 6: installation of lighting and light-signalling devices

Netherlands 1

Issue : ECE R48.04 supplement 6 paragraph 6.19.7 reads:  
*6.19.7.1. The **daytime running lamps** shall be **switched ON automatically** when the device which starts and/or stops the engine (propulsion system) is set in a position which makes it possible for the engine (propulsion system) to operate.  
 However, the daytime running lamps may remain OFF while the following conditions exist:  
 6.19.7.1.1. The automatic transmission control is in the park position; or  
 6.19.7.1.2. The parking brake is in the applied position; or  
 6.19.7.1.3. Prior to the vehicle being set in motion for the first time after each manual activation of the propulsion system.*  
  
*6.19.7.2. The **daytime running lamps** may be **switched OFF** manually when the vehicle speed does not exceed 10 km/h provided they switch ON automatically when the vehicle speed exceeds 10 km/h or when the vehicle has travelled more than 100 m and they remain ON until deliberately switched off again.*  
*6.19.7.3. The daytime running lamp shall switch OFF automatically when the device which starts and/or stops the engine (propulsion system) is set in a position which makes it impossible for the engine (propulsion system) to operate or the front fog lamps or headlamps are switched ON, except when the latter are used to give intermittent luminous warnings at short intervals.*  
*6.19.7.4. The lamps referred to in paragraph 5.11. are not switched ON when the daytime running lamps are switched ON."*

Conclusion:

It is required that the DRL's always shall be switched on automatically (6.19.7.1.), but shall switch off when the front fog lamps or headlamps are switched on (6.19.7.3.).

Also it is allowed to manually switch the DRL's off (6.19.7.2.), but only when the vehicle speed is less than 10 km/h.

Question : Is it allowed to manually switch off the DRL's by switching on the lamps mentioned in paragraph 5.11 when the vehicle speed exceeds 10 km/h?

Solutions	A	Yes, there is no specific requirement that prevents the possibility to drive around at a vehicle speed over 10 km/h with only the lamps referred to in paragraph 5.11. on	
	B	No, it is clearly stated that the DRL's may only be switched off manually when the vehicle speed is less than 10 km/h.	

**TAAM Minutes:**

**There was unanimous support for Solution B.**

**MEANING OF AUTOMATIC ACTIVATION****BACKGROUND**

R48.05 mandates headlamp cleaners (installed in conjunction with the installation of headlamp cleaning device(s) according to ECE Regulation No. 45) for headlamps producing a total objective luminous flux which exceeds 2000 lumen.

ECE R45.01 then requires that, in the absence of any automatic activation of the cleaning device, it must operate through at least one cleaning period when, the headlamps being already switched on, the windscreen washers are operated.

**DISCUSSION**

In the context of the above legislation, this paper seeks to clarify the meaning of ‘automatic activation’.

The requirement for ‘automatic activation’ could be considered to only be met by fully independent operation of the headlamp cleaners triggered automatically by a form of optical sensing device (e.g. photo cell) which can detect a reduction in light transmitted through the headlamp lens when the lens becomes dirty.

Furthermore, in the absence of any such ‘automatic activation’ of the cleaning device, the words of ECE R45 paragraph 6.5.4 could be read to mean that, when the headlamps are switched on, the headlamp washer must operate literally every time the windscreen washer are operated.

However, we have been requested by some vehicle manufacturers to accept the principle that ‘automatic activation’ could simply be some form of sequencing that links the operation of the headlamp washers to a particular sequence of windscreen washer operations. For example, one headlamp wash cycle to every five windscreen wash operations, with the possible addition of a set time gap between headlamp cleaning periods to avoid unnecessary headlamp cleaning cycles when the driver repeatedly activates the windscreen washers to clear a smear on the windscreen.

Whilst we are willing to adopt a pragmatic approach we are concerned that some form of sequencing that simply links the operation of the headlamp washers to a particular sequence of windscreen washer operations might not be in line with the provisions of ECE R45 paragraph 6.5.4 and we would therefore appreciate the views of the other TAAM delegates.

**QUESTION 1**

Can Solution A and Solution B both be considered to provide ‘automatic activation’



Possibilities of solution

Comments

<b>A</b>	Independent activation of the headlamp cleaners triggered automatically via, for example, an optical sensor, when the headlamp lens becomes dirty	
<b>B</b>	Linked sequence between windscreen washer operation and headlamp cleaner operation (for example, 1 operation of headlamp washers after every 5 operations of windscreen washers with, additionally, a set time gap between each headlamp cleaner operation if required)	

**LEGISLATION**

***ECE R48.05***

**6.2. *DIPPED-BEAM HEADLAMP (REGULATIONS NOS. 98 AND 112)***

**6.2.9. *Other requirements***

*The requirements of paragraph 5.5.2. shall not apply to dipped-beam headlamps. Dipped-beam headlamps with a light source or LED module(s) producing the principal dipped beam and having a total objective luminous flux which exceeds 2,000 lumen shall only be installed in conjunction with the installation of headlamp cleaning device(s) according to Regulation No. 45. 11/ [R48s4-54]*

***ECE R45.01***

**6.5.4** *The control of the cleaning device shall be operable from the driver's seat and may be coupled with the controls for other cleaning devices.*

*In addition, when the cleaning device is required to be fitted according to Regulation No. 48, and in the absence of any automatic activation of the cleaning device, it must operate through at least one cleaning period when, the headlamps being already switched on, the windscreen washers are operated.*

**TAAM Minutes:**

**The meeting agreed that Solutions A and B can both be considered to meet the criteria for 'automatic operation'.**

**BACKGROUND**

ECE R48.05 permits any lamp to be installed on movable components provided that the conditions specified in paragraphs 5.18., 5.19. and 5.20. are fulfilled.

Paragraph 5.18 states that rear position lamps, rear direction-indicators and rear retro-reflectors, triangular as well as non triangular, may be installed on movable components only if at all fixed positions of the movable components the lamps on the movable components meet all the position, geometric visibility, colorimetric and photometric requirements for those lamps.

Paragraph 5.19 states that when the movable components are in a position other than a "normal position of use", the devices installed on them shall not cause undue discomfort to road users.

Paragraph 5.20 states that when a lamp is installed on a movable component and the movable component is in the "normal position(s) of use", the lamp shall always return to the position(s) specified by the manufacturer in accordance with this Regulation.

**DISCUSSION**

In the case of the following foldable tail lift installation the lamps move with the operating mechanism:



Figure 1: Normal position of use for vehicle (tail lift stowed)



Figure 2: Operating (fixed) position for tail lift (vehicle parked)

When the tail lift is deployed and lowered to a fixed position on the ground the lamps would not comply with all the position, geometric visibility, colorimetric and photometric requirements for those lamps.

In order to assess compliance with R48.05 there are therefore two key issues that need to be considered:

- 1) Whether the requirements of 5.18 are only applicable to fixed positions of moveable components when the vehicle itself is in a normal position of use (i.e. parked or driving)

and

- 2) Whether, for the purposes of R48.05, Figure 2 would be considered to represent a 'normal position of use' for the vehicle.

### **QUESTION**

Can the rear lamps for the vehicle conditions shown in Figures 1 and 2 be considered to comply with R48.05?

Possibilities of solution

Comments

<b>A</b>	Yes	Paragraph 5.18 is not applicable and only Paragraph 5.19 will apply
<b>B</b>	No	Paragraph 5.18 applies

**LEGISLATION**

**R48**

**Definitions**

- 2.22. *"Movable components" of the vehicle mean those body panels or other vehicle parts the position(s) of which can be changed by tilting, rotating or sliding without the use of tools. They do not include tiltable driver cabs of trucks;*
- 2.23. *"Normal position of use of a movable component" means the position(s) of a movable component specified by the vehicle manufacturer for the normal condition of use and the park condition of the vehicle;*
- 2.24. *"Normal condition of use of a vehicle" means:*
  - 2.24.1. *For a motor vehicle, when the vehicle is ready to move with its propulsion engine running and its movable components in the normal position(s) as defined in paragraph 2.23.;*
  - 2.24.2. *And for a trailer, when the trailer is connected to a drawing motor vehicle in the conditions as prescribed in paragraph 2.24.1. and its movable components are in the normal position(s) as defined in paragraph 2.23.*
- 2.25. *"Park condition of a vehicle" means:*
  - 2.25.1. *For a motor vehicle, when the vehicle is at standstill and its propulsion engine is not running and its movable components are in the normal position(s) as defined in paragraph 2.23.;*
  - 2.25.2. *And for a trailer, when the trailer is connected to a drawing motor vehicle in the condition as described in paragraph 2.25.1. and its movable components are in the normal position(s) as defined in paragraph 2.23.*

**General requirements**

- 5.17. ***Any lamp may be installed on movable components provided that the conditions specified in paragraphs 5.18., 5.19. and 5.20. are fulfilled.***
- 5.18. *Rear position lamps, rear direction-indicators and rear retro-reflectors, triangular as well as non triangular, may be installed on movable components only:*
  - 5.18.1. ***If at all fixed positions of the movable components the lamps on the movable components meet all the position, geometric visibility, colorimetric and photometric requirements for those lamps.***

- 5.19. *When the movable components are in a position other than a "normal position of use", the devices installed on them shall not cause undue discomfort to road users.*
- 5.20. *When a lamp is installed on a movable component and the movable component is in the "normal position(s) of use", the lamp shall always return to the position(s) specified by the manufacturer in accordance with this Regulation. In the case of dipped-beam headlamps and front fog lamps, this requirement shall be considered satisfied if, when the movable components are moved and returned to the normal position 10 times, no value of the angular inclination of these lamps, relative to its support, measured after each operation of the movable component, differs by more than 0.15 per cent from the average of the 10 measured values. If this value is exceeded each limit specified in paragraph 6.2.6.1.1. shall then be modified by this excess to decrease the allowed range of inclinations when checking the vehicle according to Annex 6.*
- 5.21. *The apparent surface in the direction of the reference axis of front and rear position lamps, front and rear direction-indicator lamps and retro-reflectors shall not be hidden more than 50 per cent by any movable component, with or without a light-signalling device installed on it, in any fixed position different from the "normal position of use".*
- If the above requirement is not practicable:*
- 5.21.1. *Additional lamps satisfying all the position, geometric visibility, colorimetric and photometric requirements for the above indicated lamps shall be activated when the apparent surface in the direction of the reference axis of these lamps is more than 50 per cent hidden by the movable component;*
- or*
- 5.21.2. *A remark in the communication form (item 10.1. of Annex 1) shall inform other Administrations that more than 50 per cent of the apparent surface in the direction of the reference axis can be hidden by the movable components; and  
A notice in the vehicle shall inform the user that in certain position(s) of the movable components other road users shall be warned of the presence of the vehicle on the road; for example by means of a warning triangle or other devices according to national requirements for use on the road.*
- 5.21.3. *Paragraph 5.21.2. does not apply to retro-reflectors.*

#### **TAAM Minutes:**

**The delegates agreed that both given figures can be considered to acceptable within the provisions of R48, provided that there are additional retro-reflectors available to ensure that the provisions of R48 Section 6.14 are met even when the tail lift is in the lowered position.**

<b>Reference to Annex, etc in the Directive or Regulation:</b>	
<p><b>Text:</b> With effect from 10 July 2011, if the requirements laid down in Directive 76/756/EEC, as amended by this Directive, are not complied with, Member States, on grounds related to the installation of lighting and light-signalling devices, shall consider Certificates of Conformity which accompany new vehicles in accordance with the provisions of Directive 70/156/EEC to be no longer valid for the purposes of Article 7(1) of that Directive.</p>	
<p>Question: The RDW has taken the position that M1 vehicles whose approvals do meet the requirements of Directive 76/756/EEC before the 10 of July 2011, shall also meet the requirements after that date. For this reason, the RDW did maintain the validity of the M1 type approvals without amendment by directive 2007/35/EC.</p> <p>How have other countries dealt with that situation?</p>	
Solutions:	
A	When the adapting directive does not have effect on one or more vehicle categories at all, the approvals of these vehicle categories will be maintained.
B	When the adapting directive literally does not exempts vehicle categories, there type approvals will be no longer valid without the adaptation.

**TAAM Minutes:**

**The Netherlands clarified that this topic does not concern so much the update of the approval but the need to apply the end-of-series provisions. After a short discussion the meeting concluded that the application of the end-of-series would be a good approach.**

- Regulation number :
  - Directive 97/27/EC relating to the masses and dimensions of certain categories of motor vehicles and their trailers .
  - Framework Directive 2007/46/EC

*Text of Directive 97/27/EC*

**1.1.2. Each of the Member States' authorities must, for their respective country, determine the registration/in-service maximum permissible laden mass of a given vehicle according to the following principles: [...]**

- **the registration/in-service maximum permissible laden mass is determined as the greatest mass inferior or equal to the technically permissible maximum laden mass and to the relevant vehicle maximum authorised mass in force in that Member State (or a lower mass at the request of the manufacturer in agreement with the Member State's authorities), and which complies with the**

*Text of Directive 2007/46/EC*

Annex II, A):

**Vehicle categories are defined according to the following classification: (Where reference is made to 'maximum mass' in the following definitions, this means 'technically permissible maximum laden mass' as specified in item 2.8 of Annex I.) [...]**

- Issue

According to the 97/27/EC directive, the registration mass has to be inferior or equal to the technically permissible maximum laden mass.

Question :

Let's consider a N2 vehicle with a TPMLM at 4500 kg and a mass in running order at 3000kg

Is it possible to define a registration mass of this vehicle at 3500 kg ? (i.e. with a mass inferior to the minimum mass of the category N2)



<u>Possibilities of solution</u>		<u>Comments</u>
A	Yes, a N2 vehicle may have a registration mass inferior or equal to 3500 kg	
B	No, the registration mass must comply to the definition of the category of the vehicle detailed in the annex II of the 2007/46/EC Directive. In this case the minimum registration mass must be over 3500 kg.	If a N2 vehicle may be registered at 3500kg, it is a kind of “change” of category. It is as if a N1 vehicle was type-approved without all the requirements of N1 (consumption, CO2, eventually protective steering and side impact ...)
C	Each country is free to authorize any registration mass of vehicles and have only to check that is inferior or equal of the TPMLM	

**TAAM Minutes:**

**The meeting concluded that, as far as it does not concern national approvals, the vehicle has to meet the provisions for the lower vehicle category.**

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

Annex I, point 2.4.2

**Text:**

2.4.2. 'Vehicle width' is a dimension which is measured according to ISO standard 612-1978, term No 6.2.

In addition to the provisions of that standard, when measuring the vehicle width the following devices must not be taken into account:

- customs sealing devices and their protection,
- devices for securing the tarpaulin and their protection,
- tyre failure tell-tale devices,
- protruding flexible parts of a spray-suppression system (see Council Directive 91/226/EEC),
- lighting equipment,
- for vehicles of categories M2 and M3, access ramps in running order, lifting platforms and similar equipment in running order provided that they do not exceed 10 mm from the side of the vehicle and the corners of the ramps facing forwards or rearwards are rounded to a radius of not less than 5 mm; the edges must be rounded to a radius of not less than 2,5 mm,
- mirrors and other devices for indirect vision,
- tyre-pressure indicators,
- retractable steps,
- the deflected part of the tyre walls immediately above the point of contact with the ground,
- watching aids,
- retractable lateral guidance devices on buses and coaches intended for use on guided bus systems, if not retracted.

**Question:**

By the multi-stage approval according to the Dir. 2007/46/EC is on the van-type truck vehicle with max. width 2.55 m and 2.6 m for conditioned (isothermal) van-type truck (according to the Dir. 96/53/EC) mounted the poster-holder.

The width of this poster-holder is 12.5 mm on each side. The overall width of the vehicle increases in 25 mm and then the width of the van-type truck is 2.575 m and 2.625 m for conditioned (isothermal) van-type truck.

Does the second indent of the Annex I, point 2.4.2. of the Dir. 97/27/EC (devices for securing the tarpaulin and their protection) include also such poster-holder mounted on van-type vehicle?

**Solutions:**

A	The poster-holder is excluded from the measuring of the width of the vehicle according to the second indent of the Annex I, point 2.4.2. of the Dir. 97/27/EC
B	The poster-holder is included in the width of the vehicle.
C	Each MS decides according to the national legislation.

Remarks:

see <http://www.4media-werbeproduktionen.com>



**TAAM Minutes:**

**It was confirmed that, for granting an approval according Directive 97/27/EC, the poster-holders have to be taken into account when measuring the width of a vehicle.**

**It was noted the national in-use provisions would be up to the Member States.**

**A PILLAR OBSCURATION****LEGISLATION**

77/649/EEC:

*2.15. A Pillar*

*'A pillar' means any roof support forward of the vertical transverse plane located 68 mm in front of the V points and includes non-transparent items, such as windscreen mouldings and door frames, attached or contiguous to such a support.*

*5.1.2. The angle of obstruction for each "A" pillar, as described in point 5.1.2.1, shall not exceed 6 degrees.*

*5.1.2.2. No vehicle shall have more than two A pillars*

*5.1.3. Other than the obstructions created by the "A" pillars, the fixed or movable vent or side window division bars, outside radio aerials, rear-view mirrors and windscreen wipers, there should be no obstruction in the driver's 180° forward direct field of vision below a horizontal plane passing through V<sub>1</sub>, and above three planes through V<sub>2</sub>, one being perpendicular to the plane X - Z and declining forward 4° below the horizontal, and the other two being perpendicular to the plane Y - Z and declining 4° below the horizontal*

Paragraph 2.15 defines an A pillar as including any solid item attached or contiguous to it, including windscreen mouldings and door frames. In the English language "contiguous" means "next to or touching, sharing a common border". 5.1.2 restricts the obscuration to 6 degrees, measured in the way specified in the Directive (see below). 5.1.3 prohibits any obstruction other than A pillars, vents, side window division bars, aerials, mirrors and wipers.

Hence a secondary pillar can only be either part of the one A pillar, and so be included in the limit of 6 degrees of obscuration, or be a window division bar.

Obscuration is measured using one ocular location.

The method of obscuration measurement set out in the Directive allows relatively thick A pillars to be approved. This is due to the method of measuring horizontally from 2 degrees up inner to 5 degrees down outer favouring a thick but steeply raked pillar, as compared with a thin upright pillar.

Hence vehicles can be approved within the letter of the Directive but with thick A pillars which, in practice, can cause significant obscuration.

77/649/EEC will be repealed by the General safety Regulation 661/2009/EC in 2014 and replaced by UNECE Regulation 125, which has the same text.

**THE SAFETY CONCERN**

The point at issue is not the number of A pillars but the obscuration caused by those A pillars. However if pillars are ignored then the obscuration caused by them will not be taken into account and so actual obscuration will be worse than measured obscuration.

The difficult question is how much obscuration causes a safety hazard.

On the one hand it could be argued that, as the Directive permits significant A pillar obscuration in practice anyway, any additional pillars will make little difference. Also multiple pillars might provide less actual obscuration than one thick pillar. On the other hand, the Directive was agreed to set a minimum standard and should be respected.

In the UK there has been considerable press and public concern about the poor visibility afforded by modern designs with thick and/or multiple A pillars obscuring other road users, especially vulnerable users on bicycles and motorcycles at junctions.

## **DISCUSSION**

The Directive was written at a time when vehicles typically had slim and upright A pillars with opening quarter lights and a non-structural element – a window division bar - separating the quarter light from the main side window:



VCA believes that window division bars were excluded from the measurement because they were not significant at the time. But vehicle designs have changed and it is now common to have secondary A pillars – all of the following being approved:







VCA has a relatively strict interpretation of the requirements. We allow secondary pillars that are contiguous to the obvious primary A pillar, as with all the above, but we include them in the obscuration measurement.

We do not allow multiple A pillars i.e. where there are two or more pillars that are not contiguous:



However, some other Authorities appear to ignore both contiguous secondary pillars and multiple pillars when measuring obscuration. We assume that they are calling them side window division bars, otherwise their obstruction would not be permitted by paragraph 5.1.3. We have been shown evidence that for 2 types of vehicle that have 2 distinct pillars on each side, where the second pillar creates the door frame and so is clearly a structural element, the second pillar was not included in the obscuration measurement for type approval.

We have been shown evidence that an Authority is willing to take the definition of A pillar from the pedestrian protection regulation 78/2009, on the basis that the vehicle will also be approved to 78/2009:

*“‘A-pillar’ means the foremost and outermost roof support extending from the chassis to the roof of the vehicle.”*

By using this definition for forward vision the other pillars can be deemed to not be A pillars. Again, we assume that the Authority would regard them as side window division bars.

## **QUESTION**

How should multiple A pillars be treated for forward vision obscuration?



Possibilities of solution

Comments

<b>A</b>	Only one pillar should be called the A pillar, and no other pillars are permitted. Window division bars can be <b>only</b> non-load bearing elements that simply seal the gap between 2 panes of glazing.	Some current approved designs would no longer be acceptable.
<b>B</b>	Multiple A pillars are permitted but all must be included in the measurement of A pillar obscuration. Window division bars can be <b>only</b> non-load bearing elements that simply seal the gap between 2 panes of glazing.	Some current approved designs would no longer be acceptable.
<b>C</b>	Only the foremost outermost pillar extending from the chassis to the roof of the vehicle should be called the A pillar and all other pillars can be deemed to be window division bars and ignored for obscuration.	Significant and unlimited obscuration would be allowed.
<b>D</b>	Another solution?	

**TAAM Minutes:**

**Most of the delegates were of the opinion that all pillars have to be taken into account when calculating the obscuration angle and it was agreed that this whole topic needs clarification from GRSG.**

**The UK delegation agreed to request its DfT representative to raise this issue at GRSG for further guidance .**

**Pending the outcome of the GRSG discussions, the authorities agreed to follow Solution B.**

**CRITERIA FOR DETERMINATION OF FLOOR LINE****BACKGROUND**

The general requirement for cab exteriors is that the 'external surface' of the vehicle must not exhibit, directed outwards, any part likely to catch on pedestrians, cyclists or motor cyclists and must not exhibit, directed outwards, any pointed or sharp parts or any projections of such shape, dimensions, direction or hardness as to likely to increase the risk or seriousness of bodily injury to a person hit by the external surface or brushing against it in the event of a collision.

The exterior projections on N Category vehicles apply essentially to the contactable areas of the cab above the floor line (or, at the choice of the manufacturer, a lower reference plane) and an upper plane 2000mm above the ground.

The floor line is determined as follows:

*When a vertical-axis cone of undetermined height having its side at an angle of 15° to the vertical is moved about the external surface of the loaded vehicle so as to remain in contact with the external surface of the body at its lowest point, the floor line is the geometrical trace of the points of contact.*

The definition for the floor line includes the following derogation:

*In determining the floor line, no account is taken of the exhaust pipes or wheels, or of functional mechanical features attached to the under-body such as jacking points, suspension mounting or attachments for use in towing or in case of breakdown.*

**DISCUSSION**

In the case of a purpose built road sweepers like the example shown below, the front sweepers, even in the transit (i.e. non brushing) position, would probably not meet the general requirements for cab exteriors.



**QUESTION**

Can the sweeper brushes and associated mechanical and hydraulic linkages be ignored for the purposes of determining the floor line such that the area to be considered for exterior projections will only extend to the lower part of the cab structure?

Possibilities of solution

Comments

<b>A</b>	Yes	The brushes and associated linkages can be considered to be ‘functional mechanical features
<b>B</b>	No	
<b>C</b>	This vehicle can be classified as mobile machinery and, as such, is outside the scope of the automotive legislation	

**LEGISLATION**

1. SCOPE

*This Directive applies to the external projections forward of the cab’s rear panel of motor vehicles of category N; it is limited to the external surface as defined below and does not apply to the exterior rear-view mirrors, including their supports, or to the accessories such as aerials and luggage racks.*

2. DEFINITIONS

*For the purpose of this Directive:*

- 2.1. ‘External surface’ means that part of the vehicle forward of the cab’s rear panel as defined in 2.5 with the exception of the rear panel itself, and includes such items as the front wings, front bumpers and front wheels;
- 2.2. ‘Vehicle type-approval’ means the approval of a vehicle with regard to its external projection;
- 2.3. ‘Vehicle type’ means motor vehicles which do differ in such essential respects as the ‘external surface’;
- 2.4. ‘Cab’ means that part of the bodywork which constitutes the driver and passenger

- compartment, including the doors;
- 2.5. 'Cab rear panel' means the rearmost part of the external surface of the driver and passenger compartment. Where it is not possible to determine the position of the rear cab panel, for the purposes of this Directive it would be deemed to be the vertical transversal plane situated 50 cm to the rear of the R point of the drivers seat, with the drivers seat, if adjustable, located at its rearmost driving position (see Annex III to Directive 77/649/EEC) (1). If the cab is fitted with more than one row of seats, the rearmost passenger seat in its rearmost position has to be taken into account for the definition of the rear cab panel. However, the manufacturer may, with the agreement of the technical services, request an alternative distance if 50 cm can be shown as being inappropriate for particular vehicle;
- 2.6. 'Reference plane' means a horizontal plane passing through the centre of the front wheels or a horizontal plane situated at the height of 50 cm above the ground, whichever is lower. This plane is defined for the laden state of the vehicle;
- 2.7. 'Floor line' means a line determined as follows:  
When a vertical-axis cone of undetermined height having its side at an angle of  $15^\circ$  to the vertical is moved about the external surface of the loaded vehicle so as to remain in contact with the external surface of the body at its lowest point, the floor line is the geometrical trace of the points of contact. **In determining the floor line, no account is taken of the exhaust pipes or wheels, or of functional mechanical features attached to the under-body such as jacking points, suspension mounting or attachments for use in towing or in case of breakdown.** In the spaces at the outside of wheel arches in imaginary surface extending the adjacent external surfaces without change of position is assumed. The front bumpers are taken into account in determining the floor line. Depending on the type of vehicles, the trace of the floor line may be at either the lower outer edge of the bumper profile or at the body panel below the bumper. Where there are two or more points of contact at the same time, the lowest point of contact is used to determine the floor line;
- 2.8. 'radius of curvature' means the radius of the arc of a circle which comes closest to the rounded form of the component under consideration.
- 2.9. 'Laden vehicle' means the vehicle at its technically permissible maximum laden mass and the distribution of this mass among the axles as stated by the manufacturer.

### 3. GENERAL REQUIREMENTS

- 3.1. The provisions of this Directive do not apply to these parts of the 'external surface' of the vehicle which, with the vehicle unladen, with doors, windows, access lids, etc., in the closed position are either:
- 3.1.1. **outside a zone having as its upper line a horizontal plane situated 2.00 m above the ground and as its lower limit either the reference plane defined in 2.6 or the floor line defined in 2.7, as selected by the manufacturer; or**
- 3.1.2. located within the zone as described in 3.1.1, but in static condition cannot be contracted by a sphere of 100 mm in diameter.
- 3.1.3. Where the reference plane is the lower limit of the zone, account is also taken of the parts of the vehicle below the reference plane falling between two vertical planes, one touching the external surface of the vehicle and the other parallel to it and set 80 mm towards the interior of the vehicle from the point at which the reference plane touches the bodywork of the vehicle.
- 3.2. The 'external surface' of the vehicle must not exhibit, directed outwards, any part likely to catch on pedestrians, cyclists or motor cyclists.
- 3.3. The 'external surface' of the vehicle must not exhibit, directed outwards, any pointed or sharp parts or any projections of such shape, dimensions, direction or hardness as to likely to increase the risk or seriousness of bodily injury to a person hit by the external surface or brushing against it in the event of a collision.
- 3.4. Projecting parts of the outer surface having a hardness of not more than 60 Shore A may have a radius of curvature lower than the values prescribed in section 4 below.

**TAAM Minutes:**

**The meeting considered that, in the case of the example shown, only Solutions B and C would be appropriate.**

Responses to recent email queries circulated by Germany were reported as follows:

### EMAIL QUERY 1

#### Issue

#### **1.) Issuing of COC**

KBA Query to the procedure for issuing of CoC for 50 km/h tractors (national provisions and approval), after the change of Motormanagement and fulfilment of a parallel approved EC-Type 40km/h tractor.

#### **Directive 2003/37/EC amended by Directive 2006/96/EC**

Provisions regarding the Certificate of Conformity

#### Issue

It is not possible to grant EC-approvals for tractor types of category T5. That category describes tractors with a maximum design speed of more than 40 km/h. A list of requirements to be fulfilled subject to the category is stated in Annex II Chapter B of Framework Directive 2003/37/EC. This list refers for category T5 tractors to Base Directives that need to be amended before they will be applicable.

A holder of KBA type-approvals brings as rule two similar tractor types on the market. One type with a maximum design speed up to 40 km/h, the other type comes with a maximum design speed of more than 40 km/h. The maximum design speed is the only technical difference between the two types.

- Tractors up to 40 km/h are approved according Directive 2003/37/EC. A Certificate of Conformity (CoC) according article 6 of the Directive is issued.
- Tractors with a design speed above 40 km/h are brought into service according specific national regulations of each member-state. For these tractors no CoC is issued.

After a nationally approved tractor (with a design speed of more than 40 km/h) was in service for some time the owner may want it to be reprogrammed in order to convert it into an EC approved one. After reprogramming the tractor fulfils all requirements of the EC-type-approval. Other modifications are not necessary. Reprogramming the used tractor and verify the conformity of the used tractor with the requirements described in the EC-type-approval may be done by the approval holder.

#### Questions:

- What proceeding is recommended by the European type approval authorities?
- May the approval holder issue a CoC referring to a specific extension of an EU-type-approval for a tractor that before reprogramming the maximum design speed has been in service for a period of time on foundation of special national regulations?

#### Prescription

Directive 2003/37/EC as amended by Directive 2006/96/EC

Possibilities of solution

Comments

<b>A</b>	Yes, it is recommended that the approval holder may issue a CoC whenever he is in a position to verify that the tractor is in conformity with the EC-type-approval.	Article 6 of Directive 2006/96/EC does not address the date of issuing that certificate. It says that a certificate shall accompany each vehicle in conformity with the approved type. There are some preconditions: <ul style="list-style-type: none"><li>- The CoC may only be issued in case that all requirements of Directive 2006/96/EC are fulfilled.</li><li>- Date of the CoC should be the date at which conformity is verified.</li><li>- An additional manufacturer's plate according to the EC-Directive has to be affixed.</li><li>- Any former national approval number has to be crossed out in a way that it stays legible.</li></ul>
<b>B</b>	No, it is recommended that the approval holder may only issue a certificate of conformity before the tractor is brought into service for the first time.	It may be difficult/impossible to verify conformity with a type-approval in case that some parts subject to regular wear and tear are replaced by non-serial parts. Replacements like these will be a common situation.
<b>C</b>	No, the type approval authorities should not recommend any proceeding.	According article 7 the certificate of conformity is necessary for registration. Any decision regarding recognition of that document is up to the registration authority of the member-state.

**TAAM Minutes:**

**Germany reported the results of this email query as follows:**

**Austria, The Netherlands, UK, Ireland, Italy, Slovakian Republic, Swiss, Czech Republic und Bulgaria have chosen the following answer:**

**It is recommended that the approval holder may only issue a certificate of conformity before the tractor is brought into service for the first time.**

**Germany and Belgium chose the solution:**

**It is recommended that the approval holder may issue a CoC whenever he is in a position to verify that the tractor is in conformity with the EC-type-approval.**

## EMAIL QUERY 2

### **2.) Influence of passengers in buses when using the ,Halt-braking-systems'** (Activating the HbS due to the use of the emergency operating controls of the service doors)

#### **Directive 2007/85/EC emergency operating devices of a power-operated service door acting on the halt brake system**

##### Issue:

Busses are frequently equipped with a “halt break system”. Neither Directive 2007/85/EC nor UN/ECE Regulation 13 gives a definition of a system like that. However section 2.27 of Directive 2007/85/EC offers a definition on the more general term “starting prevention device”.

“starting prevention device” means an automatic device which prevents the vehicle being driven away from rest”

Section 7.6.5.8 provides more detailed information.

“A starting prevention device, if fitted, shall be effective only at speeds of less than 5 km/h and shall be incapable of operation above that speed.”

As a general rule a halt break system acts on sub-assemblies of the service braking system. The service braking system is defined in section 5.1.2.1. of UN/ECE Regulation 13:

“The service braking system must make it possible to control the movement of the vehicle and to halt it safely, speedily and effectively, whatever its speed and load, on any up or down gradient. It must be possible to graduate this braking action. The driver must be able to achieve this braking action from his driving seat without removing his hands from the steering control.”

In case that an emergency operating devices of a power-operated service door acts automatically on the halt brake system a person - who is not the driver of the vehicle - activates a sub-assemblies of the service braking system.

##### Questions:

- Is it allowed that the emergency operating devices of a power-operated service door activates the halt brake system?
- Does the admissibility depend on the speed of the buss (for instance: admissible only during standstill, only during very low speed (e. g. 1.8 km/h) or admissible up to the speed mentioned in 7.6.5.8 regarding starting prevention device).

##### Prescription

Directive 2007/81/EG, UN/ECE Regulation 107, UN/ECE Regulation 13



Possibilities of solution

Comments

<b>A</b>	<b>Yes</b> , it is admissible to activate a halt brake system automatically by activating the interior emergency operating controls of a power-operated service door.	Directive 2007/81/EC and Regulation 13 do not deal with halt brake systems which are neither service braking systems or secondary braking systems nor parking braking systems.
<b>B</b>	<b>No</b> , it is inadmissible to activate a halt brake system automatically by activating the interior emergency operating controls of a power-operated service door.	According to Regulation 13 section 5.1.2.1. it must be possible to graduate the braking action and the driver must be able to achieve the braking action from his or her driving seat. According the Vienna Agreement he or she <b>alone</b> shall be in a position to control the brakes.

**TAAM Minutes:**

**Germany reported the results of this email query as follows:**

**Latvia, Poland, Swiss, Ireland and Germany have chosen the following answer:**

**It is inadmissible to activate a halt brake system automatically by activating the interior emergency operating controls of a power-operated service door.**

**This question is again under discussion in the next GRSG – there is a tabled proposal.**

### EMAIL QUERY 3

3.) Due to a question by the KBA asked to a TAA the following information might need to be circulated:

The provisions under the Reg. (EC) 78/2009 for pedestrian protection contain monitoring procedures. „Upper Leg form to Frontal Protection System leading Edge“  
Vehicles approved under this Reg. shall undergo also those monitoring tests.

The question is, whether an approval can be given without the monitoring values?

#### **Regulation (EC) No 78/2009 regarding the protection of pedestrians and other vulnerable road users**

Monitoring values

##### Issue:

Article 12 of Regulation (EC) No 78/2009 states that the national authorities provide the Commission with the results of the monitoring referred to in the points 2.2, 2.4 and 3.2 of Annex I of that Regulation.

- 2.2. Upper legform to bonnet leading edge
- 2.4. Adult head form to windscreen
- 3.2. Upper legform to bonnet leading edge

All three tests are to be performed on vehicles.

Monitoring is mentioned in connection with frontal protection systems (FPS) as well:

“5.2 Upper legform to FPS leading edge

The test is performed at an impact speed 40 km/h. The instantaneous sum of the impact forces with respect to time, to the top and the bottom of the impactor, should not exceed a possible target of 5,0 kN and the bending moment on the test impactor should not exceed a possible target of 300 Nm. **Both results shall be recorded for monitoring purpose.**”

The type-approval certificate for the type of a FPS as a separate technical unit shall contain a chart where the data for “Upper leg form to frontal protection system leading edge – three test position (monitoring only)” can be filled in.

##### Questions:

Is it necessary to state the results of the tests carried out for monitoring in the approval documents irrespective if the national authorities have to provide the Commission with that results or not.

Prescription

Regulation (EC) No 78/2009

Possibilities of solution

Comments

<b>A</b>	<b>Yes</b> , it is necessary to state the values in the approval documents.	The values are important information to describe the approved type.
<b>B</b>	<b>No</b> , it is not necessary to state the values in the approval documents.	The values can be provided the commission on demand.

**TAAM Minutes:**

**Following the German email query this item was further discussed during the meeting and there was unanimous agreement with Solution A.**

## **6. ITEMS RELATING TO FRAMEWORK DIRECTIVE 2002/24/EC (MOTOR CYCLES)**

### **6.1. 2002/24/EC and UN-ECE Regulation 10 or 97/24/EEC, Chapter 8**

**Germany 4**

#### **Issue/Information:**

For a Whole-Vehicle-Type-Approval (WVTA) according to directive 2002/24/EC the requirements of 97/24/EC Chapter 8 according to electromagnetic compatibility have to be fulfilled.

Directive 2002/24/EC does not explicitly state that ECE-R 10 is accepted as equivalent to 97/24/EC, although according to 2007/46/EC ECE-R 10.2 is recognized as an alternative to 72/245/EEC.

In Annex V of the proposal for a new regulation (EU) for the approval and market surveillance of two- and three-wheel vehicles and quadricycles (new mother regulation) ECE-R 10 is already mentioned as the only requirement regarding electromagnetic compatibility.

In Annex III of the council decision of 27 November 1997 (97/836/EC) regarding the accession by the European Community to several UN-ECE Regulations it reads:

“... The technical requirements of the UN/ECE-Regulations listed above shall become alternatives to the technical annexes to the relevant separate EC-Directives where the latter possess the same scope and where for the listed Regulations separate EC-Directives exist...”

Regulation 10 was part of the list.

With regard to the aforementioned explanations KBA would accept test-reports or approvals according to Regulation 10 also for category L vehicles, while granting a WVTA according to 2002/24/EC.

This point is just for information of the TAAM participating parties.

#### **TAAM Minutes:**

**The meeting consensus was in support of the German approach.**

## **7. ITEMS RELATING TO FRAMEWORK DIRECTIVE 2003/37/EC (Agricultural and Forestry Tractors)**

### **7.1. Directive 2009/144/EC: certain components and characteristics of wheeled agricultural or forestry tractors**

*Estonia 1*

<b>Directive number</b>
Directive 2009/144/EC
<b>Subject:</b>
Registration of new tractors which do not comply with Directive 2009/144/EC
<b>Text of legal acts:</b>
<p>The aim of Directive 2009/144/EC is to clarify the existing legislation relating to certain components and characteristics of tractors by codifying and repealing the Directive 89/173/EC and its amendments.</p> <p>In the Article 2 (3) it is said:</p> <p>3. With respect to new tractors which do not comply with the <u>requirements laid down in this Directive</u>, and on grounds relating to <u>the subject-matter of this Directive</u>, Member States:</p> <ul style="list-style-type: none"><li>• (a) shall consider <u>certificates of conformity</u> which accompany new tractors in accordance with the provisions of Directive 2003/37/EC to be <u>no longer valid</u> for the purposes of Article 7(1) of that Directive;</li><li>• (b) <u>may refuse the registration</u>, sale or entry into service of those new tractors.</li></ul> <p>The Directive 2009/144/EC should be applied from 1 June 2010.</p> <p>Article 7 of Directive 2003/37/EC states:</p> <p>Registration, sale and entry into service</p> <ul style="list-style-type: none"><li>• 1. Each Member State shall <u>register new type-approved vehicles</u>, permit their sale or permit their entry into service on grounds relating to their construction and functioning <u>only if they are accompanied by a valid certificate of conformity</u>.</li></ul>

**Concern:**

Article 7 of Directive 2003/37/EC states clearly that Member State shall register new type-approved vehicles only if they are accompanied by a valid certificate of conformity. In Article 2 (3)(a) of Directive 2009/144/EC it is written that certificate of conformity will no longer be valid for the purposes of Article 7 (1) of Directive 2003/37/EC (for registration). As there is no application date specified all the provisions of Directive 2009/144/EC should be applied from 1 June 2010.

In contrast to above mentioned provisions, Article 2 (3)(b) of Directive 2009/144/EC still enables Member States decide whether they apply the registration prohibition or not. Is there a contradiction between provisions in Directive 2003/37/EC and Directive 2009/144/EC?

Directive 2009/144/EC is the codified version of Directive 89/173/EC and its amendments and therefore all the technical requirements should remain unchanged. In the Article 2 (3) of Directive 2009/144/EC it is said that with respect to new tractors which do not comply with the requirements laid down in this Directive, and on grounds relating to the subject-matter of this Directive, Member States shall consider certificate of conformity to be no longer valid.

The formulation of provision “on grounds relating to the subject-matter of this Directive” is clear. If the tractor does not meet the technical requirements laid down in the Directive, the above mentioned provisions apply.

However the formulation of provision “the requirements laid down in this Directive” is not so clear. Does this means that new tractors which do not have a EC type-approval certificate granted under the directive 2009/144/EC cannot be registered as from 1 of June 2010 (even though the tractors fulfil all technical requirements and have a valid type-approval certificate granted under the Directive 89/173/EC last amended by directive 2006/26/EC) on the basis that the tractors do not comply whit legal provisions of the Directive 2009/144/EC?

**Questions**

If the new tractor does not have a valid EC type-approval certificate granted under the Directive 2009/144/EC, should be the registration of such tractors prohibited from 1 of June 2010?

Solution			Accepted	Refused
A	Yes	According to Article 2 (3) of Directive 2009/144/EC, certificates of conformity of new tractors which do not comply with the requirements laid down in this Directive will be no longer valid		
B	No	Due to the fact that directive 2009/144/EC is the codified version of directive 89/173/EC (i.e. tractors still meet the technical requirements)?		

**TAAM Minutes:**

**The majority of the meeting supported Solution B.**

**Text**

Directive 2000/25/EC, Article 3a

**Flexibility Scheme**

By way of derogation from Article 3(1) and (2), Member States shall provide that, at the request of the tractor manufacturer, and on condition that the approval authority has granted the relevant permit for placing on the market in accordance with the requirements of the emissions 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 3 years where no subsequent stage exists.

**Background**

The flexibility scheme allows a tractor manufacturer to place on the market the engines whose approval has expired. Based on this article we received requests for approvals of a new type of tractor fitted with an engine whose approval has expired, but to which may be applied the flexibility scheme.

**Question**

It is possible to grant approval to a new type of tractor fitted with an engine whose approval has expired but to which may be applied the flexibility scheme?

Possibilities of solution

<b>A</b>	It is not possible. The flexibility scheme is applicable only for tractors already approved.	
<b>B</b>	It is possible	

**TAAM Minutes:**

**The meeting agreed with Solution A.**



## **8. MISCELLANEOUS**

### **8.1. Short report of the ETAES-Meeting**

*Germany*

#### **TAAM Minutes:**

**(Chair of the ETAES group) outlined key points from the ETAES meeting that was held in Geneva on 18 November 2011. Full details will be available through the ETAES meeting report which will be circulated separately.**

**TAAM Minutes:**

(Chairman of the TAAM Multi-Stage subgroup) reminded the meeting that the purpose of this subgroup is to develop a set of guidelines in order to achieve a common approach for EC multi-stage approvals.

Whilst, there was general support for the guidelines that had been previously circulated the French delegation requested an opportunity to make some minor clarifications to some of the content.

It was therefore agreed that a further multi-stage subgroup discussion would be held at the time of a planned GSR subgroup meeting in Germany during January 2012 (see Item 8.3.1.)

### 8.3. GSR Subgroup Issues

#### 8.3.1. Short report of the GSR sub group, including the progress at the Commission **UK**

##### **TAAM Minutes:**

**Chair of the informal TAAM GSR subgroup, reported on progress to date.**

**An initial subgroup meeting was held in the UK in August 2011 and the minutes were circulated to all TAAM delegates. It was explained that a letter requesting clarification of issues raised during the subgroup meeting were then sent to the Commission and, although a response has now been received, further discussion is still needed.**

**It was noted that there are, in particular, three key issues that have yet to be satisfactorily resolved.**

- Uncertainty about application of transitional provisions for the mandatory UN Regulations listed in the GSR legislation,**
- Extensions of approvals issued under the provisions of repealed Directives,**
- The possibility and/or need for specific approval for the GSR itself.**

**For further details see the minutes of the August 2011 GSR Subgroup meeting and the related correspondence with the Commission which are annexed to this TAAM report.**

**It was agreed that a further subgroup meeting is therefore needed and the German delegation kindly agreed to host the meeting in Flensburg during the second week of January 2012.**

**8.3.2. TAAM RIGA ITEM 5.10. 2007/46/EC, EC661/2009: Numbering of GSR approvals**

*Netherlands 1*

<b>Directive or Regulation number:</b>		
General Safety Regulation (EG) No. 661/2009 and Framework Directive 2007/46/EC		
<b>Subject:</b>		
Numbering of GSR approvals		
<b>Reference to Annex, etc in the Directive or Regulation:</b>		
2007/46/EC, Annex VIII, point 1		
<hr/>		
<b>Question:</b>		
<p>Annex VIII to 2007/46/EC describes exactly how the approvals for the regulatory acts mentioned in Annex IV have to be numbered. We all know that an approval on 70/222/EEC means a registration plate approval. However, taking the provisions of implementing regulation (EU) 1003/2010 on the space and mounting of rear registration plates as an example, the application of Annex VIII would result in the following type approval number: e4*661/2009*1003/2010*1234*00 for an approval under the General Safety Regulation. After each amendment of the implementing regulation on registration plates section 3 of the type approval number will change and from that moment every recognition of the technical topic covered by that approval from the type approval number will be disappeared. The Commission promised that the implementing measures for the GSR would give a solution for that problem.</p> <p>Annex I, Part 2 of regulation 1003/2010, gives the model for the type approval certificate. In the heading is stated that it “concerns an approval with regard to Regulation (EU) No 1003/2010, as last amended by Regulation (EU) No .../... ( 1 )”. This means that the implementing measures are seen as the base directive and not the GSR. Following this principle the type approval number would be: e4*1003/2010*1003/2010*1234*00. In case of a future amendment of 1003/2010 in 2012 the type approval number would be: e4*1003/2010*.../2012*01.</p> <p>As it is already possible to grant approvals based on 1003/2010 in parallel to directive 70/222/EEC we will be faced with approvals for which the numbering system is not yet available. This has already resulted in a different approach by the Member States and that raised problems for the computer systems of the other Member States. In the absence of any guidance from the Commission the approval authorities should number the approvals in a harmonised manner.</p> <p>How shall the type approval authorities number the approvals based on the implementing measures of the GSR, taking regulation 1003/2010 as an example?</p>		
<b>Solutions:</b>		
A	e4*661/2009*1003/2010*1234*00	This is in line with Annex VIII to 2007/46/EC.
B	e4*1003/2010*1003/2010*1234*00	This is in line with the models for the type approval certificate given in the implementing measure.

**TAAM RIGA Minutes:**

**The meeting agreed on the solution B.**

**TAAM Minutes:**

**It was agreed that, if necessary, this item would be further discussed in the GSR subgroup meeting in Flensburg to take account of any developments from the Commission.**

<b>Directive or Regulation number</b>
Regulation (EC) No 661/2009
<b>Subject:</b>
Definition of “New type of vehicle” AEBS/LDWS
<b>Text:</b>
<p>1.4 Definition of type of vehicle according to General Safety Regulation 661/2009:</p> <p>1.5 Regulation 661/2009 article 13, point 12  <i>“With effect from 1 November 2013 national authorities shall refuse, on grounds relating to the areas of vehicle safety covered in Article 10, to grant EC type-approval or national type-approval in respect of <u>new types of vehicle</u> of categories M2, M3, N2 and N3, where such vehicles do not comply with this Regulation and its implementing measures.”</i></p> <p>1.6 Regulation 661/2009 article 3, definitions  <b>“For the purposes of this Regulation, the definitions lay down in Article 3 of Directive 2007/46/EC shall apply.”</b></p> <p>1.7 Directive 2007/46/EC article 3, point 17  <i>“‘type of vehicle’ means vehicles of a particular category which do not differ in at least the essential respects specified in Section B of Annex II. A type of vehicle may contain variants and versions as defined in Section B of Annex II”</i></p> <p><b>Definition of type of vehicle according to AEBS proposal:</b>          Proposal AEBS (UNECE Regulation), definitions point  <b>“Vehicle type with regard to its Advanced Emergency Braking” means a category of vehicles which do not differ in such essential respects as:</b></p> <ul style="list-style-type: none"> <li><i>(a) The manufacturer's trade name or mark,</i></li> <li><i>(b) <u>Vehicle features which significantly influence the performances of the Advanced Emergency Braking System,</u></i></li> <li><i>(c) The type and design of the Advanced Emergency Braking System.</i></li> </ul> <p><b>Definition of type according to LDWS proposal:</b>          Proposal LDWS (UNECE Regulation), definitions point  <b>“Vehicle type with regard to its Lane Departure Warning System” means a category of vehicles which do not differ in such essential respects as:</b></p> <ul style="list-style-type: none"> <li><i>(a) the manufacturer's trade name or mark,</i></li> <li><i>(b) <u>vehicle features which significantly influence the performances of the Lane Departure Warning System,</u></i></li> <li><i>(c) the type and design of the Lane Departure Warning System.</i></li> </ul>

**Concern:**

The application date of the installation of AEBS and LDWS are defined in the General Safety Regulation. This application date could be understood as applicable for new type of vehicles (interpreted as a new WVTa) or for new system type approval (interpreted as a new type of vehicle in accordance to AEBS / LDWS regulation).

**Questions:**

A vehicle obtains the WVTa before 1 November 2013. After this date and before 1 November 2015 (application date for new registrations, sales and entries into service), could this vehicle change all braking system and increase its GVW (obtaining a new STA according UNECE Regulation No 13):

- a) Without being forced to install the AEBS?
- b) Without being forced to install the LDWS?

Solution			Accepted	Refused
A	Yes	This case is not understood as a new type of vehicle according to General Safety Regulation. Thus, it is not mandatory to install AEBS in this vehicle.	X	
	No	To change all the braking system and/or GVW will be understood as a new type of vehicle according to AEBS. Thus, it is mandatory to install AEBS in this vehicle.		
B	Yes	This case is not understood as a new type of vehicle according to LDWS regulation. Thus, it is not mandatory to install LDWS in this vehicle.	X	
	No	To change all the braking system and/or GVW will be understood as a new type of vehicle according to LDWS. Thus, it is mandatory to install LDWS in this vehicle.		

**TAAM RIGA Minutes:**

The meeting agreed to await the relevant implementing measure for General Safety Regulation 661/2009. Question is reported to the next TAAM.

**TAAM Minutes:**

**It was agreed that this item would be further discussed in the GSR subgroup meeting in Flensburg to take account of any developments from the Commission.**



**TAAM Minutes:**

**As agreed under Agenda Item 8.3.1., a further subgroup meeting will be held in Flensburg, Germany during the second week of January 2012. Full details will be circulated in due course.**

## **9. FUTURE MEETINGS**

### **9.1. Joint approach from the United Kingdom, Germany and Netherlands on the organisation of TAAM.** *Germany, UK and the Netherlands*

Participants: maximum of 2 to 3 participants per country.

Location: - In the venue of the authority  
- In a hotel or conference centre, where the delegations accept that the rental costs of the meeting accomodation is incorporated in the fee of the hotel room  
- Each participant is prepared to pay for their own lunch and meals.

No obligation to organise any social events.

For those interested in staying the weekend arrangements can be made on a ad hoc basis. Some proposals might be given by the organising country (again no obligation).

#### **TAAM Minutes:**

**There was wide support for the approach from the Netherlands, the United Kingdom and Germany to reduce the possible burdens for approval authorities to host the meetings of TAAM as indicated above.**

**It was confirmed that the more experienced delegates would always be willing to assist with advice and support with chairing and report writing, if required.**

**It was also suggested that a combined organisation by more than one authority could be beneficial in lowering the threshold for some countries to host a meeting.**

### **9.2. TAAM 2012 Q1/Q2**

#### **TAAM Minutes:**

**The meeting warmly welcomed the offer from Slovakia to host the next meeting in Bratislava on 26 and 27 April 2012; the ETAES meeting would then be scheduled for 25 April 2012.**

### **9.3. TAAM 2012 Q3/Q4**

#### **TAAM Minutes:**

**The meeting also welcomed the news that, subject to confirmation, Belgium would be willing to host the TAAM in the second half of 2012.**

**Finally, Luxembourg also kindly indicated that it would be willing to host the TAAM in the first half of 2013.**

#### **9.4. Future direction for the TAAM**

##### **TAAM Minutes:**

**Mindful of the increasing dependance of EU Whole Vehicle approvals on UN Regulations for vehicle systems approvals and the separate ongoing discussions concerning the proposals for International Whole Vehicle type approvals, the Chairman invited the TAAM delegates to discuss the implications of these developments on the future direction for the TAAM.**

##### **Key points of the discussion were:**

- the frequency of the TAAM should continue to be twice per year,**
- the underlying principles of independence and voluntary participation should be retained,**
- whilst there would be benefits in inviting other Contracting Parties to the 1958 Agreement to participate, there are also concerns that the TAAM may then become too large,**
- there are benefits in maintaining links with the EU Commission and there are also potential benefits in building a closer involvement with the UN Secretariat.**

**No conclusions were reached at this stage and the meeting agreed that this topic was worthy of more discussion at the next TAAM. However, it was recognised that the implications from these discussions could be far reaching and that a cautious step by step approach should be adopted.**

**As a first step, it was agreed that UN Secretariat (Mr Romain Hubert) should be included in the TAAM circulation list.**

**The Chair also suggested that consideration be given to inviting the WP29 delegate from Japan to attend a future TAAM – possibly as a guest to discuss the progress on the development of the International Whole Vehicle type approval proposals.**

**The Chair requested delegates to prepare comments and proposals for discussion in Slovakia.**

## **ANNEX**

Minutes of the August 2011 GSR Subgroup meeting and the related correspondence with the Commission

**Initial Information for Informal GSR Subgroup meeting to be held in  
Bristol, UK on 18 & 19 August 2011**

**Attendees**

Belgium

Finland

France:

Germany:

Netherlands:

Sweden:

UK;

**Agenda**

**- Introduction**

**Meeting Notes:** This subgroup meeting followed on from the successful Multi-Stage subgroup and comprised TAAM delegates who expressed an interest in participating following the announcement of the subgroup meeting during the previous full TAAM in Latvia. The imminent implementation of the GSR necessitated urgent discussions.

These subgroup notes will be circulated to all TAAM delegates and the Commission and a final document will be presented to the full TAAM scheduled to be held in Geneva in Q4 2011. **Action: Secretary**

**- GSR Issues/Questions:**

1. Approval number for a GRS approval where a manufacturer has combined topic that are covered by several implementing measures and/or UN Regulation. (NL)

**Meeting Notes:** See Question 9

2. UN R29. According to Article 6, item 4. This Regulation should be considered to verify the fulfilment of the requirements stated there. What would happen with those countries that have not signed the agreement of UN R29 (such the case of Spain or UK)? (Spain)

**Meeting Notes:** It is assumed that accession will be completed and hence there will be no problem

3. Date from which authorities can issue/accept EC Regulations which have been published under the implementing measures of the GSR (Germany)

**Meeting Notes:** EC Regulations can be accepted according to the into force date quoted in the specific Regulation (rather than the into force date for 661/2009). (Reference: TCMV 26 March 2010)

4. Level for R48 approval need existing vehicle types under provisions of GSR (UK)

**Meeting Notes:** Majority considered that when a specific UN Regulation level is quoted (e.g. UN R48.04) the transitional provisions of that legislation (e.g. in relation to existing types) can still be applied. Others considered that all vehicles (both new and existing types) must comply with the full provisions of the quoted minimum level of the UN Regulation (without applying the transitional provisions of the Regulation). Commission to be requested provide legal advice. **Action: Chairman**

5. If a whole vehicle approval includes system approvals (UN Regulations and EC Directives/Regulations) for all the subjects listed in 2007/46/EC Annex IV what certification is needed to confirm compliance with the GSR? (UK)

**Meeting Notes:** This raises the issue that there are still no implementing measures/administrative procedures to cover the contents and formats for the information documents and certificates that would be needed for a specific 661/2009 approval.

In the meantime, a practical approach will be to check that all the provisions of the GSR are met by reference to the list of subjects covered within the Whole Vehicle approvals and to not issue a specific GSR approval. To this end, it is proposed that Item 63 in the 2007/46/EC Whole Vehicle documents should be subdivided to list all the subjects from 661/2009 Annex I.

6. Since Article 20 only covers EC Directive/Regulations, what provisions can be used to allow new technology for a subject which, under GSR provisions, is only covered by and UN Regulation? (Germany)

**Meeting Notes:** An Article 20 exemption can be granted on the basis of a test report according to proposal for amended requirements for an UN Regulation (not a full UN systems approval). Article 21 then specifically allows the Commission to propose amendment to the relevant UN approval.

7. If, post 2014, a whole vehicle approval includes EC approvals for Directives have been repealed (but for which extensions for existing types are still allowed) how should compliance with the GSR provisions be demonstrated? (UK)

**Meeting Notes:** On the assumption that the Commission list (see Attachment 2) will allow some extensions after 2014. These extensions to the repealed Directives will be accepted as equivalent approvals to the corresponding UN Regulations listed in the GSR requirements (661/2009 Annex I)

8. GSR Multi-stage implications if the changes create a new system type (UK)

**Meeting Notes:** Consider GSR requirements on a subject by subject basis. Hence, consider GSR provisions against the individual system provisions and, if no changes are made to that first stage system by the second stage manufacturer, the first stage system approval will remain valid for the second stage whole vehicle approval

For example: Considering a vehicle built in two stages. If the vehicle in the first stage does not require ESC then the second stage does not require ESC unless the braking system is changed by the second stage.

(i.e. Although a multi-stage approval could create a new whole vehicle type, the requirements for ESC would only be considered in the context of the braking approval from the first stage. If the second stage does not change the braking systems then the first stage brake approval would be considered as an existing approval which would not be invalidated).

A similar approach can be applied for the GSR provisions for Gear shift Indicators, Tyre Pressure Monitoring, Lane Departure Warning and Advanced Emergency Braking.

However, if the first stage approval is affected by the second stage the second stage must comply with all the requirements for new type (including ESC, GSI and TPM as appropriate)

9. Numbering system (NL)

The GSR makes an approval possible for a combination of different technical topics. The question is how to number such an approval. Just as an example a manufacture could transmit test reports for Regulation (EU) No. 19/2011, UN Regulation 48 and another EU regulation 109/2011 and he requests a GSR approval certificate for these three acts.

9.1 What will be the correct number for such an approval?

- e42\*661/2009\*661/2009\*1234\*00 or
- e42\*661/2009\*19/2011-R48-109/2011\*1234\*00
- e42\*19\*/2011\*19/2011\*1234\*00 or
- another composition of the number?

9.2 What approvals shall the manufacturer indicate in Annex III, PART III and how can the type approval authority see what has been covered by such approval numbers? A similar question can rise for the table of WVTA certificate for vehicles (page 2 of Annex VI of 2007/46/EC).

**Meeting Notes:**

9.1. It is not possible to issue a 661/2009 GSR approval because the legislation does not include the necessary provisions (no type definition, no approval numbering system, no certificate and no information document)

The GSR provisions can be met by either:

- Separate systems approvals (UN Regulations and EC Regulations – depending on the subject) for all the subjects listed in the GSR
- or
- Separate test reports for those subjects.

Approval number format for separate EC implementing Regulation  
e42\*19\*/2011\*19/2011\*1234\*00

If it is intended that it should be possible to grant 661/2009 approvals then the legislation should specify the type definition, the approval numbering system to be used, the format for the certificate and the format for the information document.

Note: If it was possible to issue a specific GSR certificate the GSR approval number format would be:  
e42\*661/2009\*407/2011\*1234\*00

In addition, if a partial GSR approval is to be issued the Commission should clarify the approval numbering system to be used so that the subjects covered within the partial GSR can be identified.

9.2. Approval details for all subjects should be listed in 2007/46/EC Annex III Part III (UN or EC Regulation systems approval numbers or test report number as appropriate)

Note: If it was possible to issue a specific GSR certificate the GSR approvals they could be circulated via ETAES

10. If a manufacturer request for an approval certificate for a UN Regulation, for example R48, is it possible to issue an approval certificate for the GSR as well. If that is the case, what will be the correct number of such a GSR approval? (NL)

**Meeting Notes:** See Question 9



11. Will Annex IV, part 2 of directive 2007/46/EC be deleted? If not, be aware that the level of stringency is lower than the level required by Annex IV of the GSR. (NL)

**Meeting Notes:** The commission has proposed amendments to Annex IV Part II to recognise this point.

12. Will there be an implementing act specifying the provisions for the small series in stead of the P/A that has been introduced by the GSR? (NL)

**Meeting Notes:** The commission has proposed amendments to Annex IV Part I Appendix to recognise this point.

13. Article 4(2)

Article 4 reads:

*Article 4*

**General obligations**

1. Manufacturers shall demonstrate that all new vehicles sold, registered or put into service within the Community are type-approved in accordance with this Regulation and its implementing measures.
2. Manufacturers may choose to apply for type-approval with regard to all the systems, and the installation of all the components and separate technical units covered by this Regulation, or for type-approval with regard to one or more systems and the installation of one or more components and one or more separate technical units covered by this Regulation. **Type-approval in accordance with the UN Regulations listed in Annex IV shall be considered as EC type-approval in accordance with this Regulation and its implementing measures.**
3. Manufacturers shall demonstrate that all new systems, components and separate technical units sold or put into service within the Community are type-approved in accordance with this Regulation and its implementing measures.

**Discussion point:** Does the text in bold in Article 4(2) mean that a type approval certificate for the UN Regulations is needed and that, despite of “whereas” number 3 a mixed type approval procedure is not possible for topics covered by UN Regulations? (NL)

**Meeting Notes:** This means that if a manufacturer has an approval it can be used as an equivalent. This does not preclude the use of test reports instead of certificates to satisfy the GSR provisions (see Attachment 1).

14. Article 7(5)

This paragraph reads:

5. Materials used in the **construction of the inside** of bus and coach bodywork shall, as far as possible, prevent or at least retard fire in order to allow occupants to evacuate the vehicle in the event of fire.

**Discussion point:** In the near future the provisions of UN Regulation 118 will be extended to the engine compartment and separate heating compartments. As these compartments do not belong to the inside of a bus or a coach the question rises whether those “new” provisions have to be fulfilled as well? (NL)

**Meeting Notes:** The revised requirements of UN Regulation 118 will apply (including provisions for engine compartment)

#### 15. Article 12(2)

This paragraph on Electronic stability control systems reads:

2. With the exception of off-road vehicles as defined in points 4.2 and 4.3 of Section A of Annex II to Directive 2007/46/EC, the following vehicles shall be equipped with an electronic stability control system meeting the requirements of this Regulation and its implementing measures:

(a) vehicles of categories M<sub>2</sub> and M<sub>3</sub>, except for those with more than three axles, articulated buses and coaches, and buses of Class I or Class A;

(b) vehicles of categories N<sub>2</sub> and N<sub>3</sub> except for those with more than three axles, tractors for semi-trailers with a gross vehicle mass **between 3.5 and 7.5 tonnes**, and special purpose vehicles as defined in points 5.7 and 5.8 of Section A of Annex II to Directive 2007/46/EC;

(c) vehicles of categories O<sub>3</sub> and O<sub>4</sub> equipped with air suspension, except for those with more than three axles, trailers for exceptional load transport and **trailers with areas for standing passengers**.

#### Discussion points:

1. The words in bold in subparagraph (b) means in the Dutch language literally that exact 3.5 tonnes and 7.5 tonnes are not included. Is that also the view in other languages?

2. What are “trailers with areas for standing passengers”, buses? (NL)

#### Meeting Notes:

1. Semi trailer Tractor units with GVM greater than 3500 kg and no more than 7500 kg are exempt from the ESC provisions.

2. “Trailers with areas for standing passengers”, are mentioned in the revised Annex II for National Approval only.

#### 16. Article 13(1)

This paragraph reads:

1. With effect from 1 November 2011, national authorities shall refuse, on grounds relating to electronic stability control systems, to grant EC type-approval or national type-approval in respect of **new types of vehicle** of categories M 1 and N 1 which do not comply with this Regulation and its implementing measures.

**Discussion point:** What is meant with “new type of vehicles”, a vehicle offered for whole vehicle type approval or offered for an approval related to ESC on the level of a “separate implementing measure”? (NL)

**Meeting Notes:** The ESC requirements are covered by the brake system approval. The majority view is that the type definition should be based on the brake approval criteria (rather than the whole vehicle criteria) [i.e. a new whole vehicle approval can be issued without ESC after 1 November 2011 (but before 1 November 2014) provided that the R13H approval for that vehicle is issued before 1 November 2011]

In respect of multi-stage approvals, if no changes are made to that first stage system by the second stage manufacturer the first stage system approval will remain valid for the second stage whole vehicle approval (cross reference Question 8).

The French delegates had reservations with this approach and agreed to seek clarification from the Commission is required to confirm that type definition should be based on the UN R13H brake approval type criteria rather than the 2007/46/EC whole vehicle type criteria. **Action: France**

#### 17. Article 13(4)

This paragraph reads:

4. Following the implementation dates set out in Table 2 of Annex V, national authorities shall, on grounds relating to electronic stability control systems, consider certificates of conformity for new vehicles of categories M<sub>2</sub> , M<sub>3</sub> , N<sub>2</sub> , N<sub>3</sub> , O<sub>3</sub> and O<sub>4</sub> to be no longer valid for the purposes of Article 26 of Directive 2007/46/EC, and shall prohibit the registration, sale and entry into service of such vehicles, where such vehicles do not comply with this Regulation and its implementing measures.

**Discussion point:** A similar paragraph is missing for vehicles of category M<sub>1</sub> and N<sub>1</sub>. Does it mean that for M<sub>1</sub> and N<sub>1</sub> old approval will remain valid? (NL)

**Meeting Notes:** This is covered by Article 13 Section 5 which applies the provisions of Article 12(1) (i.e. ESC for M1 and N1 vehicles) from 1 November 2014.

#### 18. Article 13(14)

This paragraph reads:

14. National authorities shall permit the sale and entry into service of vehicles, components and separate technical units type-approved before the dates referred to in paragraphs 1, 2 and 3 and continue to grant extension of approvals to those vehicles, components and separate technical units under the terms of the regulatory act under which they were originally permitted or granted, **unless the requirements** applying to such vehicles, components or separate technical units **have been modified or new requirements have been added** by this Regulation and its implementing measures. National

authorities shall permit the sale and entry into service of and continue to grant extensions to EC type-approval to replacement components and separate technical units, with the exception of replacement tyres, intended for vehicles type-approved before the dates referred to in paragraphs 1, 2 and 3, under the terms of the regulatory act under which they were originally permitted or granted.

**Discussion point:** UN Regulations and EU directives are seldom identical. In most cases the UN Regulations are much more developed than the directives and finally the provisions will be modified or new provisions will be added. That means that this paragraph is of no value at all for the transfer from directives to UN Regulations. Be also aware that sometimes an amendment means a relaxation of the provisions and, when reading the paragraph literally, such amendment would mean the end of the validity of the “old” approvals based on the directives! A written guidance from the Commission is urgently needed. (NL)

**Meeting Notes:** In the case of subjects covered by mandated UN Regulations, this issue is unofficially covered by the informal document shown in Attachment 2. The Commission should be requested to formalise the Attachment 2 list and clarify the status of the list in relation to Articles 13 and 14. **Action: Chairman**

In the case of EU Regulations this issue is covered by the relevant implementing measures

**19.** In the case of GSR Regulations for systems approvals can we accept component approvals from the previous (repealed or to be repealed) Directive (e.g. Spray Suppression)? (UK)

**Meeting Notes:** For EC Directive approvals that can remain valid under the provisions of the relevant implementing measures for the new EU Regulations, component approvals from previous (repealed or to be repealed) Directives can be accepted for new vehicle systems approval under the provisions of the new corresponding new EU Regulation (also refer to Question18)

**20.** The GSR (407/2011) is stating the necessary supplement level of the UN-Reg Approvals.(D)

The approval number is not telling the level of supplement, nor the test report. How do we confirm the level of testing/approving?

For the future(F) and for today existing approvals (T): (and/or selection)

- a) Manufacturer present a list with level of approval confirmed by the TAA (T)
- b1) The approval is stating in the header/or remark the supplement level(F)
- b2) The approval number is stating the supplement (F)
- c) The test report is stating the supplement (F)

d) KOM prepares an additional column/or use existing columns with additional suppl. level for Annex III Part III of WVTA which states the level of supplement! (F)

e) TAA use approach which is described in d), b1) and c) immediately! (F preferred solution)

F) Other solution

**Meeting Notes:** Option 'e' is agreed as a practical solution than can be implemented directly by the Type Approval Authorities by means of a TAAM agreement.

The Option 'd' would require agreement from the Commission will be requested to amend 2007/46/EC Annex III accordingly.

In addition, the Commission will be requested to propose that WP29 agree to amendments to the header and/or the approval number shown on UN Regulation Communication Form to identify the supplement/revision level to which an approval has been granted.

**21.** The unofficial KOM-list (Appendix to E-Mail) which approvals according to legal acts which have been repealed will remain valid need to get an official legal status? (D)

**Meeting Notes:** The Commission will be requested to make the list shown in Attachment 2 a formal document. See also Question 7. **Action: Chairman**

**22.** Speed limitation devices: Before GSR, Directive 92/24/EEC was not mandatory for M1 category vehicles under WVTA (Annex IV – Part I, item 47). Now, Regulation (EU) No 407/2011 (amending the GSR 661/2009), mandates UN R89, making it applicable for all vehicles of category M and N. Considering the scope mentioned in R89 – see below, does it mean that M1 vehicles having ALSD installed need R89 (Supplement 1) certification by 1 Nov 2012 for new types – 1 Nov 2014 for existing types?

R89

1. SCOPE

1.1. This regulation applies to:

1.1.1. Part I: Vehicles of categories M2, M3, N2 and N3 equipped with an SLD and to vehicles of categories M and N equipped with an adjustable speed limitation device ALSD which have not been separately approved according to Part III of this Regulation, or to vehicles so designed and/or equipped that their component parts can be regarded as totally or partially fulfilling the function of an SLD or ALSD, as appropriate.

1.1.2. Part II: The installation on vehicles of categories M2, M3, N2 and N3 of SLDs and installation on vehicles of categories M and N of ALSD which have been type approved to Part III of this Regulation.

1.1.3. Part III: SLDs which are intended to be fitted to vehicles of categories M2, M3, N2 and N3 and ALSD which are intended to be fitted to vehicles of categories M and N. (UK)

**Meeting Notes:** Under the provisions of the GSR (661/2009 Annex I) R89 is not required for M1 vehicles

**23.** Replacement brake linings: Regulation (EU) No 407/2011 includes UN R90 in the list of mandatory regulations for type approval. Does that mean replacement brake linings need to have UN R90 (Supplement 11 to the 01 series of amendments) certification by 1 Nov 2012 for new types – 1 Nov 2014 for existing types? (UK)

**Meeting Notes:** EC R90 is not required for replacement OE parts for vehicles approved under the provisions of UN R13H.

#### **- French GSR Presentation**

**Meeting Notes:** A French Document was presented which provided flow chart summaries to represent an overview of the issues related to GSR implementation. The French delegates will now prepare an updated version to reflect the outcome of the meeting minutes

#### **- ACEA Questions to Commission July 2011**

**Meeting Notes:** This document was presented for information only. The response from the Commission is awaited.

#### **- Next Meeting**

**Meeting Notes:** The next meeting of this GSR Subgroup will be held in Flensburg on Friday 14 October 2011

19 August 2011

**Attachment 1**

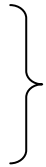
**Informal Scheme Developed in 2009 for EWVTA with GSR**

# Schemes for whole vehicle type-approval (WVTA) taking into account the Regulation on the General Safety of Motor Vehicles

## 1. WVTA (step by step procedure)

### No GSR topics

- noise
- emissions,
- airco
- recyclability
- etc



EC type approval certificates

### GSR-topics

#### -covered by UNECE

- ECE-regulation 13
- ECE-regulation 43
- ECE-regulation 46
- ECE-regulation 48
- etc



ECE-certificates

#### - not covered by UNECE

- registration plate
- statutory plate
- towing device
- etc.

partial GSR approval certificate  
partial GSR approval certificate  
partial GSR approval certificate



Or “general approval”  
certificate under GSR



WVTA certificate



**2. WVTA (single step procedure)**

**No GSR topics**

- noise
  - emissions,
  - airco
  - recyclability
  - etc
- } test reports

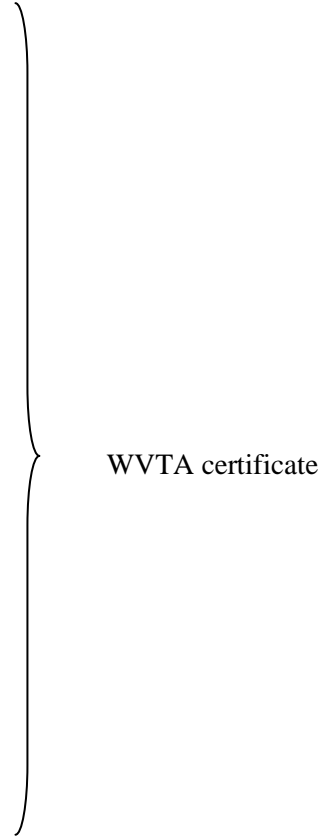
**GSR-topics**

**-covered by UNECE**

- ECE-regulation 13
  - ECE-regulation 43
  - ECE-regulation 46
  - ECE-regulation 48
  - etc
- } test reports

**- not covered by UNECE**

- registration plate
  - statutory plate
  - towing device
  - etc.
- test report  
test report  
test report  
}



**3. WVTA (mixed procedure)**

**No GSR topics**

- noise
- emissions,
- airco
- recyclability
- etc

EC type-approval certificates  
or  
test reports

**GSR-topics**

**-covered by UNECE**

- ECE-regulation 13
- ECE-regulation 43
- ECE-regulation 46
- ECE-regulation 48
- etc

ECE-certificates or  
test reports

**- not covered by UNECE**

- registration plate
- statutory plate
- towing device
- etc.

test reports  
or  
partial GSR approval certificates

Or “general approval”  
certificate under GSR

WVTA certificate

## **Attachment 2**

**Extensions to EC Directives post 2014**

**VALIDITY AND EXTENSION OF APPROVALS GRANTED UNDER EU DIRECTIVES REPEALED  
BY REGULATION (EC) NO 661/2009 ON GENERAL SAFETY OF MOTOR VEHICLES**

13.12.2010

National authorities shall permit the sale and entry into service of vehicles type-approved before the date referred to in Article 13 of Regulation (EC) No 661/2009 and continue to grant extension of approvals to those vehicles under the terms of the respective repealed EU Directives following the indications in the table below.

<b>EU Directives</b>	<b>UNECE Regulations</b>	<b>Is an extension of approval possible?</b>
Fuel tanks/rear protective devices	UNECE Regulations 34, 67, 110, 58	YES
Steering effort	UNECE Regulation 79	YES
Door latches and hinges	UNECE Regulation 11	YES
Audible warning	UNECE Regulation 28	YES
Indirect vision devices	UNECE Regulation 46	YES
Braking	UNECE Regulations 13, 13H	NO
Radio interference (electromagnetic compatibility)	UNECE Regulation 10	YES
Interior fittings	UNECE Regulation 21	YES
Anti-theft and immobiliser	UNECE Regulations 18, 116, 97	YES

<b>EU Directives</b>	<b>UNECE Regulations</b>	<b>Is an extension of approval possible?</b>
Protective steering	UNECE Regulation 12	YES Except for vehicles with electric propulsion
Seat strength	UNECE Regulations 17, 80	NO
Exterior projections	UNECE Regulation 26	YES except for shark fin antennas
Speedometer and reverse gear	UNECE Regulation 39	YES
Seat belt anchorages	UNECE Regulation 14	NO
Installation of lighting and light signaling devices	UNECE Regulation 48	YES
Retro reflectors	UNECE Regulation 3	NO
End-outline, front-position (side), rear-position (side), stop, side marker, daytime running lamps	UNECE Regulations 7, 87, 91	NO
Direction indicators	UNECE Regulation 6	NO
Rear registration plate lamps	UNECE Regulation 4	NO
Headlamps (including bulbs)	UNECE Regulations 1, 5, 8, 20, 31, 37, 98, 99, 112, 123	NO

<b>EU Directives</b>	<b>UNECE Regulations</b>	<b>Is an extension of approval possible?</b>
Front fog lamps	UNECE Regulation 19	NO
Rear fog lamps	UNECE Regulation 38	NO
Reversing lamps	UNECE Regulation 23	NO
Parking lamps	UNECE Regulation 77	NO
Seat belts and restraint systems	UNECE Regulation 16	NO
Forward vision	UNECE Regulation 125	YES
Identification of controls, tell-tales and indicators	UNECE Regulation 121	NO
Heating systems	UNECE Regulation 122	YES
Head restraints	UNECE Regulations 17, 25	NO
Lateral protection	UNECE Regulation 73	YES
Safety glazing	UNECE Regulation 43	YES
Speed limitation devices	UNECE Regulation 89	YES
External projections of cabs	UNECE Regulation 61	YES

<b>EU Directives</b>	<b>UNECE Regulations</b>	<b>Is an extension of approval possible?</b>
Couplings	UNECE Regulations 55, 102	YES
Flammability	UNECE Regulation 118	YES
Buses and coaches	UNECE Regulations 107, 66	NO
Frontal impact	UNECE Regulation 94	NO
Side impact	UNECE Regulation 95	NO
Vehicles intended for the transport of dangerous goods	UNECE Regulation 105	NO
Front underrun protection	UNECE Regulation 93	YES

Note to the table:

This table is to be updated on a regular basis following adaptations to technical progress of the relevant UNECE Regulations.

**Attachment 3**

**Questions to EC Commission from ACEA  
(4 July 2011)**





ACEA

**Mr Philippe Jean  
Head of Unit  
Automotive Industry  
European Commission  
DG ENTR/F/1  
B-1049 Brussels**

Brussels, 4 July 2011

**Subject: ACEA questions on GSR**

Dear Mr. Jean,

At the occasion of the MVWG we want to take the opportunity to raise some questions on GSR and its related implementing measures.

You will find the questions attached.

We apologize for the late submission of the question but we would appreciate if you could clarify the remaining open questions from the Industry.

Best regards,

Dolf Lamerigts

Attachment

## **ACEA questions on GSR**

### **1. General administrative provisions for type approval**

The vehicle industry does not fully understand how the GSR will be implemented practically.

The vehicle industry is still awaiting the “General administrative provisions”.

### **2. Recognition of existing system approval in a new vehicle type approval**

In several discussions it has been made clear by the Commission that their view is that for a new vehicle type approval, existing system approvals according to previous versions of a regulation can no longer be used. The vehicle industry does not agree with this approach and requests a legal interpretation. The Commission promised to check the legal correctness of their opinion.

The Industry is awaiting an answer to ensure clarity.

### **3. Recognition of ECE system approval in a new vehicle type approval**

The above subject raised under question 2 is even more important for Commercial Vehicles. Today, for certain changes to the vehicles (i.e. addition of a new axle configuration on a range) a new EC whole vehicle type has to be created with the possibility to use valid certificates for which this new axle configuration has no influence (i.e. all approvals with the cab itself like seat belt anchorages and control and tell tales). Certificates can be used until they lose their validity according to the transitional provisions in Geneva. Does the Commission want to change this common practice? Even more important is the question how this can be justified by the fact that an existing UN ECE system approval keeps, during a transitional period, its validity.

How does the Commission implement the UN ECE system approvals without creating a legal problem?

### **4. Extensions of approvals**

During the discussions on the implementation of the GSR a list of EC Directives has been concluded on which extensions of approvals can be granted even beyond the implementation date of 01.11.2014 of the GSR.

The vehicle industry is looking for a legal implementation of the above agreement.

## **5. Compulsory UN ECE Regulations**

In the draft compulsory UN ECE Regulation list there was a footnote reading: “The list contains references to the latest amendments of the UN ECE Regulations. When these amendments set out implementation dates later than those set out in Paragraph..., the previous version of such UN ECE Regulation still apply in the period between the dates set out in the respective paragraphs and the implementation dates set out in the UN ECE Regulation”.

In this context also a footnote is needed for R48.04 to clarify that this version of the Regulation (DRL) only applies to new vehicle types. This principle should be valid for all UN ECE Regulations.

This item has already been communicated to your services, but not yet taken into account.

## **6. Implementing Regulations and the validity of approvals to its corresponding Directive and extensions**

Most of the implementing regulations contain the following provision:

“Validity and extensions of approvals granted under Directive .././EEC.

National authorities still permit the sale and entry into service of vehicles and separate technical units type approved under Directive ... and continue to grant extensions of approvals to those vehicles and separate technical units under the terms of Directive...”.

The implementing Regulation 458/2011 on Tyre installation does not contain such a provision. This provision should be added.

## **7. Implementing Regulation 19/2011 on Statutory Plate**

The implementing regulation on the Statutory Plate requires the height of the characters of the vehicle identification number to be not less than 4mm. This will oblige vehicle manufacturers to increase the size of the capitals and numbers and probably the size of the plate or label itself without any added benefit.

The Commission has been informed about the problem and agrees to reinstate the old text of the Directive if Member States agree.

The vehicle industry requests again to reinstate the text of the Directive.

## **8. Implementing Regulation 109/2011 on Spray Suppression**

The Commission Directive 2010/19/EC (amending 91/226EC) contained only one provision for new vehicle types. To prevent that existing vehicles approved under NTA would be considered as a new type for the spray suppression requirements when applying for EC WVTA, Directive 2010/19/EC contained an Article 3 reading: “When applying for EC WVTA under 2007/46/EC, vehicle types which were granted a national or a EC type approval covering spray-suppression, shall not have to comply with the spray-suppression requirements set out in Directive 91/226/EEC”.

A similar provision should be added to implementing regulation 109/2011.

## **9. Implementing Regulation 1003/2010 on Rear Registration plates**

The Commission Regulation 1003/2010 EC (amending 70/222 EEC) does not allow a curvature less than 5000 mm radius for the rear license plate location. Former directive 70/222 was allowing 15 mm of stack which correspond to a minimum radius of 2250 mm. This means that if required for all registrations after 1 Nov 2014 several existing vehicles should face expensive changes on body stamping tools or bumper moulds for a marginal improvement. Industry suggests to reinstate the previous curvature allowance of 70/222/EEC



INVESTOR IN PEOPLE



VCA Midlands Centre  
Nuneaton, Warwickshire, UK  
Switchboard: +44 (0)247 632 8421  
Fax: +44 (0)247 632 9276  
Email: enquiries@vca.gov.uk

VCA Millbrook Centre  
Millbrook, Bedford, UK  
Telephone: +44 (0)1525 408466  
Email: millbrook@vca.gov.uk

VCA North America  
Northville, MI 48167-2664  
Telephone: +1 248-468-0151  
Fax: +1 248-349-9261  
Email: general@vcana.com  
Web: www.vcana.com

Ohio Office  
Ashland, Ohio, USA  
Telephone: +1 419-207-8123  
Fax: +1 419-207-1193  
Email: c.gepper@vcana.com  
Web: www.vcana.com

Southern Office  
Telephone: +1 770-755-5435  
Fax: +1 770-755-5435  
Email: c.rushlow@vcana.com  
Web: www.vcana.com

VCA Italy  
Via Stezzano, 87  
24126 Bergamo, Italy  
Telephone: +39 035 069 0447  
Fax: +39 035 069 0448  
Email: info@vca-italy.it

VCA Asia Pacific  
Atsuta-ku, Nagoya, Japan  
Telephone: +81 52 683 8831  
Fax: +81 52 683 8832  
Email: enquiries@m1.vca-asia.jp

VCA India  
New Delhi - 110 019, India  
Telephone: +91 11 465 18 545  
Fax: +91 11 465 18 546  
Email: admin@vca-india.com

VCA Malaysia  
Selangor, Malaysia  
Telephone: +6 037 494 0221  
or +6 037 494 4868  
Fax: +6 037 494 0225  
Email: enquiries@vca.com.my

VCA China  
Beijing, China  
Telephone: +86 10 852 830 91/2/3  
Fax: +86 10 852 830 97  
Email: ann@vca.cn

VCA Australia  
Brunswick, Victoria, Australia  
Telephone: +61 (03) 90187758  
Email: howard@vca-aus.com

#### VCA Headquarters

1 The Eastgate Office Centre  
Eastgate Road  
Bristol, BS5 6XX  
United Kingdom

Switchboard: +44 (0) 117 951 5151  
Direct line: +44 (0) 117 952  
Main Fax: +44 (0) 117 952 4103  
Email: enquiries@vca.gov.uk  
Web: www.dft.gov.uk/vca

**Mr Philippe Jean  
Head of Unit  
Automotive Industry  
European Commission  
Enterprise and Industry DG  
B-1049 Brussels  
Belgium**

22<sup>nd</sup> August 2011

Dear Mr Jean

### Implementation of the General Safety Regulation 661/2009

You may be aware that the Type Approval Authorities Meeting (TAAM) has established a sub-group to examine the practical issues of implementing the General Safety Regulation 661/2009 (GSR). I have the honour of acting as Chairman of the sub-group and I write to you on behalf of the sub-group.

The sub-group held its first meeting on August 18<sup>th</sup> and 19<sup>th</sup> 2011 and I attach a copy of the minutes of the meeting for your information. However, two specific questions arose on which the sub-group wishes to request advice from the Commission:

- Applicable levels of UN Regulations to be applied (question 4 in the meeting minutes). The majority of delegates considered that when a specific UN Regulation level is quoted in Annex V of the GSR (e.g. UN R48.04) the transitional provisions of that legislation (e.g. in relation to existing types) can still be applied. Others considered that all vehicles (both new and existing types) must comply with the full provisions of the quoted minimum level of the UN Regulation (without applying the transitional provisions of that Regulation). The Commission is requested to provide advice on this.
- Extension of approvals to Directives repealed by the GSR and replaced by UN Regulations (questions 18 and 21 in the meeting minutes). In the case of subjects covered by mandated UN Regulations, this issue is unofficially covered by the informal document circulated by the Commission dated 13.12.2010 (Attachment 2 to the meeting minutes). The Commission is requested to formalise this list and to clarify the status of the list in relation to Articles 13 and 14 of the GSR.

In view of the imminent implementation of critical aspects of the GSR we will be grateful for your urgent attention to these questions. The sub-group will meet again on October 14<sup>th</sup> and it would be very valuable to have the Commission's response for that meeting.

Yours sincerely,

**Tony Stenning  
Member of the Board  
Head of Technical and Quality Support  
Vehicle Certification Agency**

On behalf of the General Safety Regulation sub-Group of the Type Approval Authorities Meeting



**EUROPEAN COMMISSION**  
DIRECTORATE GENERAL FOR ENTERPRISE AND INDUSTRY

Industrial innovation and mobility industries  
**Automotive industry**

Brussels, **02 SEP. 2011**  
ENTR/D/5 - FH D(2011) - 1018255

**Subject: Your letter dated 22 August 2011 concerning the implementation of Regulation (EC) No 661/2009 on the general safety of motor vehicles.**

Dear Mr. Stenning,

I would like to thank you for your above-mentioned letter enquiring about the implementation of Regulation (EC) No 661/2009 on the general safety of motor vehicles (in short: the GSR).

Your first question concerns the transitional provisions of UNECE Regulations mentioned in Annex IV to the GSR, in particular UNECE Regulation No 48.04 on the installation of lighting and light-signalling devices on motor vehicles.

In this context, it has to be underlined that neither the Framework Directive 2007/46/EC on motor vehicles, nor the GSR do lay down requirements on transitional provisions stated in UNECE Regulations which have been made compulsory at EU level (i.e. listed in Annex IV to the GSR). Nevertheless, the general approach taken to date consists in the acceptance of transitional provisions for UNECE Regulations which are compulsory within the EU.

In some specific cases it was felt necessary to take a decision to explicitly state that the specific transitional provisions are to be considered at EU level. This is notably the case for UNECE Regulation No 48.04 which is already listed in Annex IV to the GSR. Hence, a draft Regulation concerning the transitional provisions of that UNECE Regulation (amongst others) will be submitted to the Technical Committee – Motor Vehicles at the occasion of its meeting of 13 October 2011. This draft Regulation is to state that the mandatory application of UNECE Regulation No 48 is without prejudice to the transitional provisions set out in that UNECE Regulation as regards the registration, sale and entry into service of new vehicles.

Furthermore, it has to be pointed out that, in the future, the issue of transitional provisions of UNECE Regulations should in principle not raise any more concerns; indeed, the EU legislation in the automotive sector is to be aligned more and more on UNECE Regulations and hence to fully take into account of transitional provisions laid down in UNECE Regulations.

Your second question concerns the status of the document on the validity and extension of approvals granted under EU Directives repealed by the GSR with effect from 1 November 2014 which is available on our website since 13 December 2010 (first version)

at: [http://ec.europa.eu/enterprise/sectors/automotive/files/safety/extension-of-approvals\\_en.pdf](http://ec.europa.eu/enterprise/sectors/automotive/files/safety/extension-of-approvals_en.pdf)

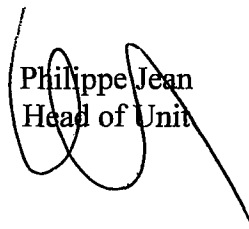
It states that national authorities shall permit the sale and entry into service of vehicles type-approved before the date referred to in Article 13 of the GSR and continue to grant extension of approvals to those vehicles under the terms of the respective repealed EU Directives following the indications in the table.

This document from the competent Commission service constitutes its interpretation of the relevant requirements of EU legislation in the automotive sector and is aimed at facilitating their application. The competent Commission service has not been informed of particular problems concerning the application of the document. However, should it, in the future, appear necessary to modify the nature of this document, the competent Commission service would then of course be ready to consider taking the appropriate measures.

I take this opportunity to inform you that a draft Regulation on the administrative procedures under the GSR will be submitted to the Technical Committee – Motor Vehicles also at its next meeting on 13 October 2011. This document – which I believe is of interest for the members of your sub-group – will clarify the specific procedures for type-approval, namely administrative provisions as well as a numbering system addressing the GSR.

I hope that the above information has been useful to you and will enable to alleviate the concerns expressed in your letter.

Yours sincerely,

  
Philippe Jean  
Head of Unit