# TYPE APPROVAL AUTHORITIES MEETING

**23-24 September 2010 – SIBIU, ROMANIA**

# TAAM MINUTES
**(version final)**

**Issue Date: 25 May 2011**

# TYPE APPROVAL AUTHORITIES MEETING

**23-24 September 2010 – SIBIU, ROMANIA**

**HELD IN THE RAMADA HOTEL**

## ATTENDEES

| | |
|---|---|
| Austria | Mr Franz Wurst |
| Belgium | Mr Wim Vandenplas<br>Mr Tim Geerts |
| Bulgaria | Mrs Milena Atanasova<br>Mr Damyan Voynovski<br>Mrs Tzvetelina Ilieva |
| Cyprus | Not represented |
| Czech Republic | Mr Lubomir Kincl<br>Mr Josef Pokorny |
| Denmark | Not represented |
| Estonia | Mr Jürgo Vahtra |
| European Commission | Mr Wolfgang Schneider |
| Finland | Mr Jukka Vedenoja<br>Mr Timo Kärkkäinen |
| France | Mr Florian Varrieras<br>Mr Pierre Bazzucchi<br>Mrs. Severine Guillaume |
| Germany | Mr Frank Wrobel<br>Mr Sven Paeslack |
| Greece | Not represented |
| Hungary | Mr Zalka Gábor |
| Iceland | Mr Einar Einarsson |
| Ireland | Not represented |
| Italy | Mr Luca Rocco |

| | |
|---|---|
| Latvia | Mr Valdis Blekte<br>Mr Janis Liepins |
| Lithuania | Not represented |
| Luxembourg | Mr Claude Liesch<br>Mr Romain Lamberty |
| Malta | Not represented |
| Netherlands | Mr Harry Jongenelen<br>Mr Peter van Tol |
| Norway | Mr Erik Saetre |
| Poland | Mr Jerzy Kownacki |
| Portugal | Not represented |
| Romania | Mr Bogdan Toader - Chair<br>Mr Adrian Raduta - Secretary<br>Mr Eugen Alexandrescu<br>Mr Alin Rosca |
| Slovakia | Not represented |
| Slovenia | Mr Tomaž Svetina<br>Mr Joze Trselic |
| Spain | Mr Lluis Sans Gomis<br>Mr Javier Fadrique |
| Sweden | Mrs Tanja Vainionpää<br>Mrs Linda Dahlgren |
| Switzerland | Mr Stefan Wenger |
| United Kingdom | Mr Derek Jones<br>Mr Anthony Stenning |

**AGENDA**

**1. Opening of the meeting**
**2. Adoption of the Agenda**
**3.Adoption of the minutes from Sofia, Bulgaria (3 - 4 June 2010)**

**4. Follow up on actions from the Sofia meeting**

4.1. Sofia Agenda item 4.1.; Brdo Agenda Item 4.2.; Bern Agenda Item 4.3.; Edinburgh Agenda Item 5.2. - 2007/46/EC Annex XVII: Multi-stage EC type approval
4.2. Sofia Agenda item 4.5.; Brdo Agenda item 5.8. - 2007/46/EC: EC-type-approval certificate
4.3. Sofia Agenda item 5.3. - 2007/46/EC, Annex II, subparagraph 4.3.: Symbol G (*Switzerland 2 TAAM Romania)*
4.4. Sofia Agenda item 5.5. - 2007/46/EC: TVV definition regarding bodywork type
4.5. Sofia Agenda item 5.7. - 2007/46/EC: CoC – Type of bodywork and wheelbase for single-axle trailers
4.6. Sofia Agenda item 5.12. - 2007/46/EC; 74/483/EEC: Exterior projections for motor-caravans
4.7. Sofia Agenda item 7.1. - 2000/25/EC as amended by 2005/13/EC: Emissions for tractors (*United Kingdom 1 TAAM Romania*)
4.8. Sofia Agenda item 7.2. - 2008/2/EC: Field of vision for agricultural tractors (*United Kingdom* 2 *TAAM Romania*)
4.9. Sofia Agenda item 8.3. - 2009/40/EC: OBD-equipped engines
4.10. Sofia Agenda item 8.4. - Adoption of vehicles to use for disabled persons
4.11. Sofia Agenda item 8.9. - 2007/46/EC, Article 22: Whole Vehicle Types for EC Small Series and EC Full Approval (*United Kingdom* 5 *TAAM Romania*)

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

5.1. 2007/46/EC, Article 3 and 5; Decision No 768/2008/EC: Manufacturer's representative - *France 1*
5.2. 2007/46/EC, Article 23(6): National small series approvals - *the Netherlands 2*
5.3. 2007/46/EC, Annex I and III; ECE Regulation 85: Maximum hourly output power of electric vehicles - *France 4*
5.4. 2007/46/EC, Annex II, Parts A and C: Definition of vehicle category - *Sweden 1*
5.5. 2007/46/EC, Annex II: Integration of electric propulsion in existing types by application of the new Annex II before the official date of entry into force - *Germany 5*
5.6. 2007/46/EC, Annex II: Definition and method of determining the "actual mass" of a vehicle of category M1- *Latvia 1*
5.7. 2007/46/EC, Annex III: List of separate approvals according to Annex III, Part III - *Germany 2*
5.8. 2007/46/EC Annex IV; ECE Regulation 105, ADR: ADR vehicles masses - *France 2*
5.9. 2007/46/EC Annex IV; 70/311/EEC; 71/320/EEC: Required certificates for ECWVTA - *the Netherlands 1*
5.10. 2007/46/EC Annex XVI; 71/320/EEC; ECE Regulation 13: ESC virtual testing according ECE R13 - *France 3*
5.11. 2007/46/EC: N1 category of vehicles - *Slovenia 1*
5.12. 70/221/EEC, Annex II: Rear underrun protection - *Switzerland 1*
5.13. 89/297/EEC: Side guard requirement on a drawbar trailer – *Finland 1*
5.14. 2006/40/EC: Mobile Air Conditioning Systems - *Germany 3*

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

6.1. 2002/24/EC, Article 2; 2007/46/EC, Article 12: Measures, including the withdrawal of the type-approval, to ensure that the conformity of production procedure is followed correctly - *the Netherlands 4*
6.2. 2002/24/EC: Battery electric vehicles with regard to specific requirements for the construction and functional safety (ECE-Regulation 100) – *Germany 4*

**7. Items relating to Framework Directive 2003/37/EC (Agricultural and Forestry Tractors)**
7.1. 2003/37/EC, Annex III: Nominal engine power – *Austria 1*
7.2. 89/173/EEC, Annex IV: Follow-up to TAAM Tallinn 27.-28.09.2007 question Spain 5 - *Finland 2*

**8. Miscellaneous**
8.1. Short report of the ETAES-Meeting - *Germany*
8.2. Short report of the Multi–Stage Subgroup - *Germany*
8.3. ECE Regulation 14: Amount of belt slack allowed during the pull test -*United Kingdom 4*
8.4. ECE Regulation 34: Definition of fuel tanks - *the Netherlands 3*
8.5. ECE Regulation 67: Components designed for an operating pressure (i.e. pressure under normal operating conditions) above 3 000 kPa (30 bar) - *Germany 1*
8.6. ECE Regulation 107: Driver's suspension seat - *United Kingdom 3*
8.7. ECE Regulation 117: Interpretation test result wet-grip values - *the Netherlands 5*
8.8. Information from Switzerland: Acceptance of approvals „e14" - *Switzerland info*

**9. Future Meetings**
9.1. 2011 Q1/Q2: to be discussed
9.2. 2011 Q3/Q4: to be discussed

## 1. Opening of the meeting

**TAAM Minutes:**

**The delegates were welcomed to Sibiu by Mr. Bogdan Toader (Head of Type Approval Compartment) and the meeting was chaired by the same person.**

## 2. Adoption of the Agenda

**TAAM Minutes:**

**The proposed meeting Agenda was accepted.**
**The meeting Chair agreed to add, under Miscellaneous the following items:**
**8.9. question about the COP procedure - Sweden**
**8.10. a short presentation by Germany of the joy-stick control device of the steering system used for the disabled people vehicles.**
**8.11. at the request of Romania it was added under Miscellaneous item 8.9 an inquiry about granting EC type approvals for M1 vehicles produced in China.**

## 3. Adoption of the minutes from Sofia, Bulgaria (3 - 4 June 2010)

**TAAM Minutes:**

**The minutes from the previous TAAM meeting held in Sofia, Bulgaria on 3-4 June 2010 were adopted without amendment.**

**4. Follow up on actions from the Sofia meeting**

4.1. Sofia Agenda item 4.1.; Brdo Agenda Item 4.2.; Bern Agenda Item 4.3.; Edinburgh Agenda Item 5.2. - 2007/46/EC Annex XVII: Multi-stage EC type approval

**TAAM Minutes:**
**The subgroup in charge of this issue will draw up the guidelines which will be presented at the next TAAM.**

4.2. Sofia Agenda item 4.5.; Brdo Agenda item 5.8. - 2007/46/EC: EC-type-approval certificate

**TAAM Minutes:**
**The problem has a legal implication, so the issue will be addressed to the next TAAEG meeting.**

4.3. Sofia Agenda item 5.3. - 2007/46/EC, Annex II, subparagraph 4.3.: Symbol G (*Switzerland 2 TAAM Romania)*

**TAAM Minutes:**
**The issue is reported to the next TAAM, waiting in the same time for a Commission experts reply.**

4.4. Sofia Agenda item 5.5. - 2007/46/EC: TVV definition regarding bodywork type

**TAAM Minutes:**
**The issue will be solved by the new form of Annex II discussed in TCMV, which will be adopted very soon.**

4.5. Sofia Agenda item 5.7. - 2007/46/EC: CoC – Type of bodywork and wheelbase for single-axle trailers

**TAAM Minutes:**
**The Part A of the issue will be also solved by the new form of Annex II discussed in TCMV, which will be adopted very soon. The solution for the Part B will be discussed in the next meeting of the "Masses and dimensions directive / regulation" group.**

4.6. Sofia Agenda item 5.12. - 2007/46/EC; 74/483/EEC: Exterior projections for motor-caravans

**TAAM Minutes:**
**Nothing to report at this stage – item carried over to the next TAAEG.**

4.7. Sofia Agenda item 7.1. - 2000/25/EC as amended by 2005/13/EC: Emissions for tractors (*United Kingdom 1 TAAM Romania*)

**TAAM Minutes:**
**The opinions remain still split. The Commission keeps its point of view: it is not allowed to grant an EC type approval for such tractors. The conclusion accepted by everyone is to address the question to the next TAAEG.**

4.8.Sofia Agenda item 7.2. - 2008/2/EC: Field of vision for agricultural tractors (*United Kingdom* 2 *TAAM Romania*)

**TAAM Minutes:**
**The conclusion of the meeting is that the tractor from the example C fulfils the requirements of the directive 2008/2/EC.**

4.9.Sofia Agenda item 8.3. - 2009/40/EC: OBD-equipped engines

**TAAM Minutes:**
**It was agreed that this item is not in the aim of TAAM and it was removed from the Agenda.**

4.10. Sofia Agenda item 8.4. - Adoption of vehicles to use for disabled persons

**TAAM Minutes:**
**Waiting for a reaction from Sweden the item is postponed for the next TAAM.**

4.11 Sofia Agenda item 8.9. - 2007/46/EC, Article 22: Whole Vehicle Types for EC Small Series and EC Full Approval (*United Kingdom* 5 *TAAM Romania*)

**2007/46/EC ARTICLE 22: EC SMALL SERIES TYPE APPROVAL**

**WHOLE VEHICLE TYPES FOR EC SMALL SERIES AND EC FULL APPROVAL**

**BACKGROUND**

At the previous TAAM held in Bulgaria the UK raised a verbal question under Agenda Item 8.9 concerning the implications for the vehicle type of upgrading from an EC Small Series approval to a full EC Whole Vehicle approval.

The meeting expressed some concern that this situation might be used to bypass the implementation dates for some of the legislative requirements that are required for full EC Whole Vehicle approval.

The meeting agreed that more time was needed to give due consideration to the full implications of this question and that it should therefore be resubmitted as a formal agenda paper for the TAAM in Romania.

**QUESTION**

Can a vehicle approved under the EC Small Series provisions be considered to be an existing type for the purposes of full EC Whole Vehicle approval or would it be considered to be a new type?

| Possibilities of solution | | | Comments |
|---|---|---|---|
| | **A** | Yes | A vehicle already granted an EC Small Series approval can have its approval upgraded to a full EC whole vehicle approval as an existing whole vehicle type. |
| | **B** | No | Whilst, when relevant, the individual systems tests used for an EC Small Series approval can used for a full EC approval, the vehicle would be considered to be a new whole vehicle type. |

**TAAM Minutes:**
**The conclusion of the meeting was unanimous for the solution B.**

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

### 5.1. 2007/46/EC, Article 3 and 5; Decision No 768/2008/EC: Manufacturer's representative - *France 1*

- Regulation number :

- Directive 2007/46/EC last amended by regulation EU/371/2010 of 5 September 2007 establishing a framework for the approval of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles
- Decision No 768/2008/EC of 9 July 2008 on a common framework for the marketing of products, and repealing Council Decision 93/465/EEC (Text with EEA relevance)

- Text of directive 2007/46/EC last amended by regulation EU/371/2010

*Article 3*
***Definitions*** *[…]*
*28. "manufacturer's representative" means any natural or legal person established in the Community who is duly appointed by the manufacturer to represent him before the approval authority and to act on his behalf in matters covered by this Directive, and where reference is made to the term "manufacturer", it is to be understood as indicating either the manufacturer or his representative;*

*Article 5*
*[…]*
*3. For the purposes of this Directive, a manufacturer established outside the Community shall appoint a representative established in the Community to represent him before the approval authority.*

- Text of decision 768/2008/EC

*Annex I*
*Article R3*
***Authorised representatives***
*1. A manufacturer may, by a written mandate, appoint an authorised representative. The obligations laid down in Article [R2(1)] and the drawing up of technical documentation shall not form part of the authorised representative's mandate.*
*2. An authorised representative shall perform the tasks specified in the mandate received from the manufacturer. The mandate shall allow the authorised representative to do at least the following:*
*(a) keep the EC declaration of conformity and the technical documentation at the disposal of national surveillance authorities for … [period to be specified in proportion to the lifecycle of the product and the level of risk];*
*(b) further to a reasoned request from a competent national authority, provide that authority with all the information and documentation necessary to demonstrate the conformity of a product;*
*(c) cooperate with the competent national authorities, at their request, on any action taken to eliminate the risks posed by products covered by their mandate*

- Issue

Since the entry into force of 2007/46/EC, the manufacturer representative seems to lead to different interpretation in Member States. We would like to share with TAAM members some point of views for a non EU manufacturer :

1. What are the requirements to be a manufacturer representative?
2. Is it possible for one manufacturer to have more than one representative for an European whole vehicle type approval purpose ?
3. Part III of the information document and COC have to be signed by the manufacturer. In the case of a non EU manufacturer which body has to sign those documents?
4. Does the obligation of having a representative is also needed for system approval?

| **Possibilities of solution** | | | **Comments** |
|---|---|---|---|
| 1 | A | The minimum requirements is a mandate from the manufacturer. | |
| | B | Other solution | |
| | | | |
| 2 | A | Yes, more than one manufacturer representative are allowed. | **For example a manufacturer can have a representative A for one type of vehicle and a representative B for another type. It could be very difficult to handle.** |
| | B | No, only one representative is allowed | **Manufacturer must defined a unique body responsible for type approval of all its vehicle type.**<br>**Several representative are authorised only for national approval purpose.** |
| | | | |
| 3 | A | Manufacturer representative has to sign COC and part III of information document. | **Manufacturer representative is the body responsible for vehicle conformity in EU.** |
| | B | A non EU manufacturer is allowed to sign COC and information document | **What is the responsibility of the representative then?** |
| | | | |
| 4 | A | Yes, a representative is also needed for a system approval. | |
| | B | No, a representative is not needed for a system approval. | |

| | |
|---|---|
| Type approving authority « e » | 2 |

| **Selection of solutions** | | Accepted | Refused |
|---|---|---|---|
| 1 | A | | |

| | | | |
|---|---|---|---|
| | B | | |
| 2 | A | | |
| | B | | |
| 3 | A | | |
| | B | | |
| 4 | A | | |
| | B | | |

**TAAM Minutes:**
**After long discussions the meeting reaches the following conclusions:**
**1. Question 1 - solution A, with the remark that it would be better to have in the mandate clear responsibilities for the representative.**
**2, Question 2 – The meeting accepted that a manufacturer may have more than one representative to cover a range of vehicle types but there can only be one representative designated for each vehicle type.**
**3. Question 3 – solution B but with the condition the name(s) and the signature(s) of the non EU manufacturer to be found in the type approval documents, including those for the COP.**
**4. Question 4 - solution A, taking account of the legal requirements of the EU legislation.**
**5. Question 5 which appeared during the discussions: are obliged manufacturers from Switzerland and Turkey to have a representative for the purpose of obtaining EC approvals?**
**Solution: being a problem with legal implications the way to solve this issue is to ask the Council.**

5.2. 2007/46/EC, Article 23(6): National small series approvals - *the Netherlands 2*

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

| **Directive or Regulation number:** |
|---|
| 2007/46/EC |
| **Subject:** |
| National small series approvals |

| **Reference to Annex, etc in the Directive or Regulation:** |
|---|
| Article 23(6) |

| **Text:** |
|---|
| 6. The validity of the type-approval shall be restricted to the territory of the Member State that granted the approval. However, if the manufacturer so requests, the approval authority shall send by registered mail or by electronic mail a copy of the typeapproval certificate and its attachments to the approval authorities of the Member States designated by the manufacturer.<br><br>Within 60 days of receipt, such a Member State shall decide whether or not it accepts the type-approval. It shall formally communicate that decision to the approval authority referred to in the first subparagraph.<br><br>A Member State shall not refuse the type-approval unless it has reasonable grounds to believe that the technical provisions according to which the vehicle was approved are not equivalent to its own. |

| **Statement:** |
|---|
| We see that many national approvals become available on ETAES. These national approvals disturb the internal procedures of RDW for ECWVTA's.<br>RDW will take no action on any uploaded national approval unless there is a separate request, by registered mail or e-mail, from the approval authority (not from the manufacturer) for accepting the national small series approval.<br>The period of 60 days, in which we have to decide on accepting or refusing of the approval, will start on the date of the e-mail and not on the date that the relevant approval has been uploaded in ETAES. |

| **Solutions:** | | |
|---|---|---|
| A | | |
| B | | |

| **Decision:** | | |
|---|---|---|
| *Solution* | *Accepted* | *Refused* |
| A | | |
| B | | |

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

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

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| **Remarks:** |
| --- |
| |

**TAAM Minutes:**
**The meeting accepted the solution: the authority which granted the national small series approvals must send a request by e-mail or registered mail for the acceptance of the approvals in case. The period of 60 days, in which the authorities have to decide on accepting or refusing of the approval, will start on the date of the letter / e-mail.**

5.3. 2007/46/EC, Annex I and III; ECE Regulation 85: Maximum hourly output power of electric vehicles - *France 4*

**Maximum hourly output power of electric vehicles**

- **Regulation number** :
- Directive 2007/46/EC amended EC/661/2009 establishing a framework for the approval of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles.
- Regulation ECE-R85 uniform provisions concerning the approval of internal combustion engines or electric drive trains intended for the propulsion of motor vehicles of categories M and N with regard to the measurement of the net power and the maximum 30 minutes power of electric drive trains

- **Text of Directive 2007/46/EC**

***ANNEX I and III***
*[…]*

*item 3.3 Electric motor*
*[…]*
*3.3.1.1 : Maximum hourly output …… kW*

- **Text of Regulation 85**

*2. **DEFINITIONS***

*2.4. "Maximum 30 minutes power" means the maximum net power of an electric drive train at DC voltage as defined in 5.3.1., which a drive train can deliver over a period of 30 minutes as an average."*
**Annex 3b**
*14.1.4. Maximum 30 minutes power: .....kW*

**Issue** :
Regulation R85 is now the regulation that is required to define the power of an electric vehicle.

Two powers are defined :
- Maximum 30 minutes power
- Net power

Framework directive 2007/46 in its annex I and III is asking a ”Maximum hourly output” in kW

**Question** :

Is the maximum hourly output the same as the maximum 30 minutes power defined in regulation R85 ?

**Additional comment** :
Authorities need to be sure that the value in item 3.3.1.1 in WVTA is corresponding to the same for all manufacturers (question of equity regarding taxation system in each country)

| Possibilities of solution | | | Comments |
|---|---|---|---|
| | A | Yes, item 3.3.1.1 is the max 30 minutes power | In some countries like France, taxation system is based on an "administrative power", calculated with the maximum 30 minutes power. |
| | B | No, it corresponds to a maximum 60 minutes power | This value is declared by the manufacturer and not verified by the technical service |
| | C | Other solution: manufacturers specify the 2 values | Authorities may need to have the 2 values for taxation reasons. |

| **Type approving authority « e »** | 2 |
|---|---|

| **Selection of solutions** | | Accepted | Refused |
|---|---|---|---|
| | A | **X** | |
| | B | | **X** |
| | C | **X** | |

**TAAM Minutes:**
**The meeting accepted the solution B, the value of hourly power being declared by the manufacturer because this value is specified in the Annex I and the Annex III of the Directive 2007/46/CE.**

5.4. 2007/46/EC, Annex II, Parts A and C: Definition of vehicle category - *Sweden 1*

SUBJECT: Definition of vehicle category
DIRECTIVE: 2007/46/EC Annex II, Parts A and C

RELEVANT SECTIONS:
Part A
**2.** Category N: Motor vehicles with at least four wheels designed and constructed for the carriage of goods.
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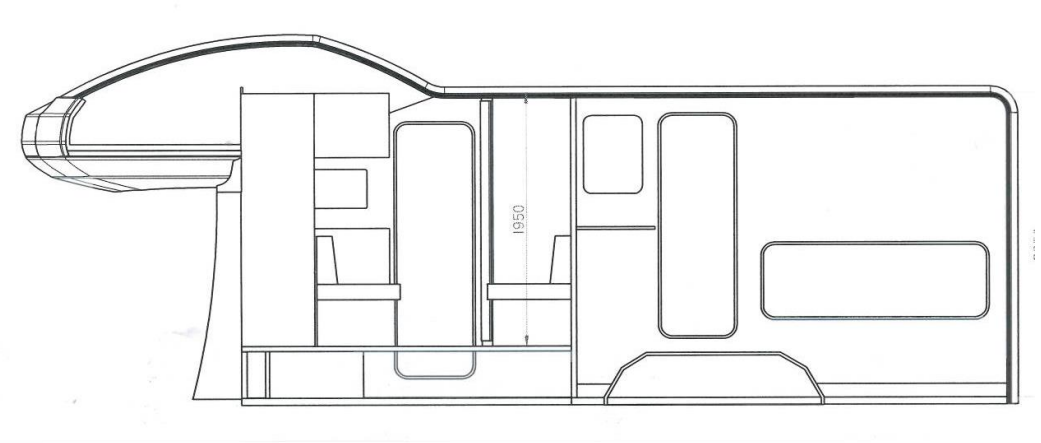
**5.1**. 'Motor Caravan' means a special purpose M category vehicle constructed to include living accommodation which contains at least the following equipment:
— seats and table,
— sleeping accommodation which may be converted from the seats,
— cooking facilities, and
— storage facilities.
This equipment shall be rigidly fixed to the living compartment; however, the table may be designed to be easily removable.
---
Part C
Passenger cars (M1)
AA Saloon ISO Standard 3833-1977, term No 3.1.1.1, but including also vehicles with more than four side windows.
AB Hatchback Saloon (AA) with a hatch at the rear end of the vehicle.
AC Station wagon ISO Standard 3833-1977, term No 3.1.1.4 (estate car)
AD Coupé ISO Standard 3833-1977, term No 3.1.1.5
AE Convertible ISO Standard 3833-1977, term No 3.1.1.6
L 263/68 EN Official Journal of the European Union 9.10.2007
AF Multi-purpose vehicle
Motor vehicle other than those mentioned in AA to AE intended for carrying passengers and their luggage or goods, in a single compartment.

PROBLEM:
Does item 5.1 mean that a vehicle equipped with living accommodation always is to be considered as an M category vehicle?

QUESTION:
1.Would the vehicle below be considered to be an M1 Special Purpose Vehicle – motor caravan – according to part A, when meeting the criteria in item 5.1, or an N vehicle according to part A, item 2, due to the fact that it is designed and constructed for carriage of goods?

2. If the interpretation of item 5.1 is that a vehicle with living accommodation always is to be considered as an M category vehicle, which bodywork code in part C is to be used?




*Living area in one compartment* *Loading area in a separate compartment*

| | | | |
|---|---|---|---|
| 1 | A | A vehicle like this is a special purpose vehicle, category M according to item 5.1 | |
| 1 | B | A vehicle like this is an N category vehicle according to item 2 | |
| 2 | A | Definition of type of bodywork | |

| **Type approving authority "e"** | **5** |
|---|---|

| Selection of solution | accepted | refused |
|---|---|---|
| Question 1 A | | |
| Question 1 B | | |
| Question 2 | | |

**TAAM Minutes:**
**Taking account of the diversity of opinions the meeting agreed to accept the solution "case by case".**

5.5. 2007/46/EC, Annex II: Integration of electric propulsion in existing types by application of the new Annex II before the official date of entry into force - *Germany 5*

Issue

Todays new concepts of electrification of the propulsion system of motor vehicles are very environmental friendly. Vehicle manufacturers are willing to construct and produce electric vehicles as fast as possible to fulfil the demand of the market.

The easiest and fastest possibility to build electric vehicles is to integrate the new propulsion system (batteries and engine) in an existing vehicle type. (examples maybe: Golf, E-class, Astra……). These vehicles comply with every single directive and regulation as they are existing types.
It's unclear if todays Annex II will create a new type of vehicle if the propulsion system is different (combustion – electric). The new Annex II will definitely allow to stay with the existing type if a manufacturer add an electric engine to the scope.

To have more environmental friendly electric vehicles being available and giving the opportunity to the manufacturer to have a faster entry into the market, an application of the new annex II philosophy would be a straight forward approach!

Question:

What would be an acceptable way to deal with the above mentioned issue?
Prescription
2007/46/EC and new Annex II

Possibilities of solution Comments

**TAAM Minutes:**
**The meeting accepted to wait for the vote in TCMV for the new Annex II.**

5.6. 2007/46/EC, Annex II: Definition and method of determining the "actual mass" of a vehicle of category M1- *Latvia 1*

Problem

In accordance with the solution of the question 5.7. (TAAM 2009 in Slovenia) "*Definition and method of determining the "actual mass" of a vehicle of category M1*" it was concluded that there is no direct link between the mass in running order as specified in section 2.6. of the information document and the actual mass in case of a vehicle of category M1. Practically we have lot of examples when data from CoC item 13 are out of line with the values of 2.6. of the information document.

Mass in running order is one of the parameters which defines category of the vehicle in accordance with the equation from 2007/46/EC Annex II Part C section 3 if the bodywork of the vehicle could be in line with either of the categories M1 or N1. Does it mean that mass in running order in information document could be freely specified by the manufacturer according to desirable category of the vehicle? List of the applicable regulatory acts for the M1 category vehicles is wider than for the N1 category. Other problem concerns data input in data base for the registration purposes. Parameters from the WVTA information document are used for the registration of the vehicles. In fact, mass values specified in the CoC do not correspond to the data which are automatically taken from the data base during the registration procedure.

Question1: Which mass in running order could be used for definition the category of the vehicle (equation from 2007/46/EC Annex II) – specified in 2.6. of the information document or in the CoC of the specific vehicle? What could be a difference between mass specified in the CoC item 13 and section 2.6.?

| 1. Possibilities of solution | | Comments |
|---|---|---|
| **1.A** | Mass in running order specified in 2.6. of the information document is used for defining of the category of the vehicle. Actual mass of the vehicle and also mass in the CoC item 13 has be at least in range of section 2.6. | Difference between CoC item 13 and section 2.6. has be in range of 5%. Notwithstanding the specific value or the range is used in section 2.6. |
| **1.B** | Mass in running order specified in 2.6. of the information document is used for defining of the category of the vehicle. But it is only theoretically because there is no direct link between masses in the CoC item 13 and section 2.6. | Actual mass of the real vehicle may be different from the section 2.6. and vehicle could be practically of different category than approved in WVTA. |

| | |
|---|---|
| *Type approving authority "e"* | **32** |

| Selection of solution | | accepted | refused |
|---|---|---|---|
| | **1.A** | X | |

| | | | |
|---|---|---|---|
| | **1.B** | | X |

**Other opinion / comment:**

Question 2: Does your country use the technical parameters from the information document (including section 2.6) for registration data base?

| 2. Possibilities of solution | | Comments |
|---|---|---|
| **2.A** | Yes, technical parameters from the information document are used for registration data base. Data from the CoC have been compared with the data base during the registration procedure. | |
| **2.B** | No, technical data just from the CoC are used for registration procedure. | |
| **2.C** | Other variant | |

| | |
|---|---|
| *Type approving authority "e"* | **32** |

| Selection of solution | | accepted | refused |
|---|---|---|---|
| | **2.A** | X | |
| | **2.B** | | X |
| | **2.C** | | |

**Other opinion / comment:**

Question 3: How do you proceed in the case if the value in CoC item 13 is out of line with the section 2.6. of the information document?

| 3. Possibilities of solution | | Comments |
|---|---|---|
| **3.A** | New CoC shall be issued with the mass in running order which corresponds to WVTA information folder section 2.6. | |
| **3.B** | CoC is acceptable because there is no direct link between the mass in running order as specified in section 2.6. of the information folder and the actual mass in case of a vehicle of category M1, if it is supposed that actual mass in the range of 5% is specified in the CoC | In some cases there could be different categories of the vehicles – M1 or N1 depending on specified mass in running order in the information folder and in the CoC, if the bodywork of the vehicle could conform to AF and BB codes. |
| **3.C** | If answer **3.B** is chosen, do you recalculate the adequacy of load capacity of the vehicle with exact number of seats | Usually, if values of the mass are out of line, the mass in running in the CoC is higher than stated in section 2.6. |

| | |
|---|---|
| *Type approving authority "e"* | **32** |

| Selection of solution | | | accepted | refused |
|---|---|---|---|---|
| | **3.A** | | X | |
| | **3.B** | | | X |
| | **3.C** | **Yes** | | |
| | | **No** | | |

**Other opinion / comment:**

**TAAM Minutes:**
**Due to various approaches and interpretations of the "masses and dimensions" directive at the moment of the meeting there are no clear answers or consensus for all the three items. The only one which has a quite common solution for all the State Members it is the item 2 with the option A, but it must be noticed even this one was not accepted by everyone.**

5.7. 2007/46/EC, Annex III: List of separate approvals according to Annex III, Part III - *Germany 2*

**Issue**

According to article 9 (1) a) Member States grant EC-approval for a type of vehicle which conforms to the particulars in the information folder and which meets the technical requirements specified by the relevant regulatory acts listed in Annex IV.

In the process of granting exemptions for example for registration, sale and entry into service of end-of-series vehicles (according to article 27), we noticed in several extensions of type-approvals granted in other member states, that the list according to Annex III, Part III contains **invalid** EC approvals.

**Question:**

Type approval authorities should pay attention, that at the date of granting an WVTA or an extension to a WVTA all of the separate approvals are still valid.

Are the Type approval authorities of the same opinion?

Prescription

Framework Directive 2007/46/EC, Annex III, Part III

| Possibilities of solution | | | Comments |
|---|---|---|---|
| | A | Yes | All separate approvals have to be valid at the date of WVTA |
| | B | No | |

| | |
|---|---|
| *Type approving authority "e"* | 1 |

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

**TAAM Minutes:**
**The meeting accepted the solution 1A.**

5.8. 2007/46/EC Annex IV; ECE Regulation 105, ADR: ADR vehicles masses - *France 2*

**ADR vehicles masses**

- Regulation number :

- Directive 2007/46/EC last amended by regulation EU/371/2010 of 5 September 2007 establishing a framework for the approval of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles
- Regulation ECE R105 concerning the approval of vehicles intended for the carriage of dangerous goods with regard to their specific constructional features
- European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR 2009)

- Text of directive 2007/46/EC last amended by regulation EU/371/2010

| |
|---|
| *Annexe IV*<br>56. \| Vehicles intended for the transport of dangerous goods : 98/91/EC (or R105) |

- Text of regulation ECE R105

| |
|---|
| *[…] 5. 1. 3. Braking equipment*<br>*Vehicles subject to the ADR Agreement shall fulfil all relevant requirements of Regulation No. 13 (including those of annex 5) as amended in accordance with the dates of application specified therein."* |

- Issue

One of the strongest requirements for ADR vehicle is to fulfil annex 5 of regulation 13. This test can limit the vehicle mass or the combination mass declared in point 2.8 and 2.11 of the information document (ID).
However ADR vehicles might be used for transportation of non dangerous goods. Example : an ADR tractor can tow a semi-trailer without any dangerous goods, an ADR container carrier may transport a container without any dangerous goods and so on …etc. In those case having restricted technical masses because of annex 5 of ECE R13 is not relevant.
In France the vehicle license states the technical masses when the vehicle transports non dangerous goods. The certificate of approval for carrying dangerous goods (point 9.1.3.5 of ADR) states the technical masses taking account of annex V of ECE R13.

We would like to give the opportunity to have 2 technical masses in WVTA depending on the goods transported in the WVTA. For ADR vehicle :

1. Do you see an opportunity to state 2 technical masses for the same TVV in 2.8 and 2.11 of the ID depending on the goods transported ?

2. Is it allowed to state 2 technical masses in the COC depending on the goods transported ?

| **Possibilities of solution** | | | **Comments** |
|---|---|---|---|
| 1 | A | Yes, it is necessary to state the 2 masses in the ID | A foot note might be added in the next evolution of annexe I and III of 2007/46/EC. |
| | B | No, only the masses corresponding to dangerous goods transportation can be stated. | |
| | | | |
| 2 | A | Yes, 2 technical masses can be stated in COC depending on the goods transported. | |
| | B | No, only 1 technical masses corresponding to dangerous goods has to be stated in COC. | Manufacturer might stated the additional masses under the point 52 "remarks" |

| | |
|---|---|
| Type approving authority « e » | 2 |

| **Selection of solutions** | | Accepted | Refused |
|---|---|---|---|
| 1 | A | **X** | |
| | B | | **X** |
| 2 | A | **X** | |
| | B | | X |

**TAAM Minutes:**
**The meeting has the common position the matter may be treated upon the decision of every Member State. There is also a common point of view by adopting, for the moment, the solution 2B. Generally speaking, from the practical point of view, this problem is closer to the registration procedures.**

5.9. 2007/46/EC Annex IV; 70/311/EEC; 71/320/EEC: Required certificates for ECWVTA - *the Netherlands 1*

| **Directive or Regulation number:** |
|---|
| 2007/46/EC, 70/311/EEC and 71/320/EEC |
| **Subject:** |
| Required certificates for ECWVTA |

| **Reference to Annex, etc in the Directive or Regulation:** |
|---|
| 2007/46/EC, Annex IV, Part I<br>70/311/EEC, Annex I, §4.2.3.2. and<br>71/320/EEC, Annex I, §2.2.2.1 |

**Text:**

2007/47/EC, Annex IV:

| Item | Subject | Directive number | Official journal reference | Applicability | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | $M_1$ | $M_2$ | $M_3$ | $N_1$ | $N_2$ | $N_3$ | $O_1$ | $O_2$ | $O_3$ | $O_4$ |
| 5. | Steering effort | 70/311/EEC | L 133, 18.6.1970, p. 10 | X | X | X | X | X | X | X | X | X | X |
| 9. | Braking | 71/320/EEC | L 202, 6.9.1971, p. 37 | X | X | X | X | X | X | X | X | X | X |

70/311/EEC, Annex I, §4.2.3.2:

**4. CONSTRUCTION PROVISIONS**

**4.2. Special provisions**

4.2.3.2. Trailers (with the exception of semi-trailers) which have more than one axle with steered wheels and semi-trailers which have at least one axle with steered wheels must fulfil the conditions given in item 5.3 below. However, for trailers with self-tracking equipment a test under item 5.3 is not necessary if the axle load ratio between the unsteered and the self-tracking axles equals or exceeds 1,6 under all loading conditions.

71/320/EEC, Annex I, §I, §2.2.2.1:

**2. CONSTRUCTION AND FITTING REQUIREMENTS**

2.2.2. Vehicles of category O

2.2.2.1. Trailers of category $O_1$ need not be fitted with a service braking system; however, if trailers of this category are equipped with a service braking system, this shall comply with the same requirements as those of category $O_2$.

**Questions:**

Question 1:
Is a certificate according directive 70/311/EEC or test report according the mixed procedure needed for a full trailer (without steered wheels at the rear)?

Question 2:
Is a certificate according directive 71/320/EEC or test report according the mixed procedure needed for a trailer of category $O_1$ without a braking system?

| **Solutions:** | | |
|---|---|---|
| Q1-A | No | The general requirements don't have relevant requirements for full trailers and therefore a full trailer fulfils these provisions spontaneously. Furthermore the test of §5.3 does not apply. |
| Q1-B | Yes | The general provisions apply to trailers so a certificate or testreport is needed to confirm that the vehicle meets the directive. |
| Q2-A | No | It doesn't make sense to require a braking certificate for a vehicle without brakes. |
| Q2-B | Yes | According Annex IV to 2007/46/EC the directive applies and therefore a certificate is needed. |

| **Decision:** | | |
|---|---|---|
| *Solution* | *Accepted* | *Refused* |
| Q1-A | | |
| Q1-B | | |
| Q2-A | | |
| Q2-B | | |

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

| **Remarks:** |
|---|
| |

**TAAM Minutes:**
**The major part of attendees is in favour of solutions 1A and 2A. But there were some opposite opinions. As the best result was voted the following solution: adopting the method of the mixed type approval at the requirements in discussion it will be written the text: "not applicable".**

## 5.10. 2007/46/EC Annex XVI; 71/320/EEC; ECE Regulation 13: ESC virtual testing according ECE R13 - *France 3*

**ESC virtual testing according ECE R13**

- Regulation number :

- Directive 2007/46/EC last amended by regulation EU/371/2010 of 5 September 2007 establishing a framework for the approval of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles
- Directive 71/320/EEC last amended by directive 2002/78/EC on the approximation of the laws of the Member States relating to the braking devices of certain categories of motor vehicles and of their trailers
- Regulation ECE R13 concerning the approval of vehicles of categories M, N, and O with regard to braking

- Text of directive 2007/46/EC last amended by regulation EU/371/2010

*Annex XVI of 2007/46/EC - Specific conditions required from virtual testing methods and regulatory acts for which virtual testing methods may be used by a manufacturer or a technical service […]*

- Text of regulation ECE R13

*Annex 21 - Specific requirements for vehicle equipped with a vehicle stability function*
*[…] As an alternative to carrying-out dynamic manoeuvres for other vehicles and other load conditions, fitted with the same vehicle stability system, the results from actual vehicle tests or computer simulations may be submitted. […]*

- Issue

Provisions of directive 71/320/EEC last amended 2002/78/EC and of directive 2007/46/EC last amended EU/371/2010 does not allow virtual testing for ESC. However regulation ECE R13 allows virtual testing for ESC in its annex 21.

1. Is it allowed to approve a vehicle for ESC purpose without any real test for a European whole vehicle type approval ?
2. Do you see a need to identify in the communication of regulation 13 system approval the test method : real or virtual ?
3. How should be considered the ECE Regulations providing virtual test for system approval which are not part of the new annex XVI of 2007/46/EC ?

| **Possibilities of solution** | | | **Comments** |
|---|---|---|---|
| 1 | A | No, it is not allowed to do virtual testing for ESC. | EU/371/2010 does not include braking. |
| | B | Other solution | |
| 2 | A | Yes, we need to know if systems approval according to ECE R13 have been carried with virtual testing. | In order to know if the system approval can be used for an EC WVTA. |
| | B | No, there is no need to identify test method. | |
| 3 | A | Virtual testing is only permitted for system approval included in annex XVI for WVTA purpose | |
| | B | Virtual testing is permitted both for system approval in annex XVI and also in regulation which permit virtual test. | |

| | |
|---|---|
| Type approving authority « e » | 2 |

| **Selection of solutions** | | Accepted | Refused |
|---|---|---|---|
| 1 | A | **X** | |
| | B | | **X** |
| 2 | A | **X** | |
| | B | | X |
| 3 | A | | |
| | B | | |

**TAAM Minutes:**
**Question1: The meeting agreed that virtual testing for ESC is allowed (Solution 1B) on the basis that R13H is accepted by 2007/46/EC for Whole Vehicle approvals (under the provisions of Annex IV Part II) and because R13H itself specifically allows virtual testing (Annex 9 - Appendix 1 - use of the dynamic stability simulation).**

**Question 2: The meeting supported Solution 2B noting that a Type Approval Authority can always ask for a copy of the test report if more clarification is required**

5.11. 2007/46/EC: N1 category of vehicles - *Slovenia 1*

**N1 category of vehicles**

- Regulation number :

## - Framework directive 2007/46/EC

- Issue

In connection with the framework Directive 2007/46/EC we would like to get the opinion of other Member States regarding the category of vehicle N1. There are many type-approved vehicles in N1 category. This kind of vehicles are not equipped with a dividing wall between cargo and passenger compartment. Our question is if other Member States allow to put such vehicles into use without modification or are there some requirements maybe on the national level (dividing wall, sheet metal on window in cargo compartment ...)?

| **Possibilities of solution** | | | **Comments** |
|---|---|---|---|
| 1 | A | We allow to put such vehicles into use without any modifications. | |
| | B | There is necessary to make modification on vehicle on national level (dividing wall, sheet metal on windows in cargo compartment ...). | |

| | |
|---|---|
| Type approving authority « e » | 26 |

| **Selection of solutions** | | Accepted | Refused |
|---|---|---|---|
| | A | | |
| | B | | |

**TAAM Minutes:**
**The meeting agreed with the solution 1A. The concerns related to this issue are supposed to be solved by the voted form of Annex II of the framework directive.**

5.12. 70/221/EEC, Annex II: Rear underrun protection - *Switzerland 1*

SUBJECT: Rear underrun protection

DIRECTIVE: 70/221/EC, annex II, paragraph 5.1, 5.5

Background

5.1
All vehicles must be so constructed and/or equipped as to offer effective protection over their whole width against under running from the rear by a vehicle of categories M and N.

5.5.

By way of derogation from the abovementioned requirements, vehicles of the following categories need not comply with the requirements of this Annex as regards rear under run protection:

- tractors for semi-trailers,
- 'slung' trailers and other similar trailers for the transport of logs or other very long items,
- vehicles for which rear under run protection is incompatible with their use.

Major Concern

The third exception mentioned in paragraph 5.5 (see above) gives area for interpretations.
Even if a manufacturer has foreseen a vehicle type for a certain use, it's the owner who decides the use of his vehicle.
Consequently the manufacturer should basically foresee a rear under run protection according directive 70/221/EC for each vehicle type.
Another practice would enable the manufacturers to derogate a vehicle type from the requirements even if only one possible use is incompatible with a rear under run protection.

Questions

Are you of the opinion that the under run protection must be made not dependent on the class of the vehicle but on the operation purpose (in connection with the class of the vehicle).

A) no — the manufacturer defines the class of the vehicle and can - with usage of the derogation possibilities – disclaim of the under run protection

B) yes — the manufacturer constructs the vehicle generally with a under run protection. The user of the vehicle declarate then if an under run protection must be in place.

C) yes — the manufacturer basically foresees of each vehicle type a rear under run protection. It can be removable or fold-away.

**Answer:** [ ]

Comments

Authority

TAA code: **„e"** **„E"** [ ]

**TAAM Minutes:**
**The item was quite disputed and the conclusions were the following:**
**At the first stage is difficult to ask the manufacturer to provide every vehicle with rear under-run protection. The type approval authority must check very carefully the final stage from the point of view of incompatibility of use and in the same time with the design, especially when are obvious difference between the design / shape of vehicle and the use class declared by the manufacturer. In principle it is the solution C but with the above mentioned amendments.**

## 5.13. 89/297/EEC: Side guard requirement on a drawbar trailer – *Finland 1*

COUNTRY: **Finland**
QUESTION NR.: **1**
SUBJECT: **Side guard requirement on a drawbar trailer**
REFERENCES (DIRECTIVE/ANNEX/ETC):
**Directive 89/297/EEC relating to the lateral protection (side guards) of certain motor vehicles and their trailers**
**ANNEX**
**…**
2.4. The forward edge of the side guard shall be constructed as follows:
2.4.1. Its position shall be:
2.4.1.1. on a motor vehicle: not more than 300 mm to the rear of the transverse vertical plane tangential to the rearmost part of the tyre on the wheel immediately forward of the guard;
2.4.1.2. on a drawbar trailer: not more than 500 mm to the rear of the plane defined in point 2.4.1.1;
…
2.5. The rearward edge of the side guard shall not be more than 300 mm forward of the transverse vertical plane tangential to the foremost part of the tyre on the wheel immediately to the rear; a continuous vertical member is not required on the rear edge.
…

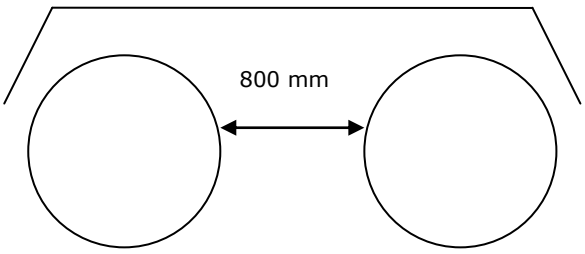
Upcoming UNECE Regulation No. 73 series of amendments 01 clarifies: *"12.6. The requirements of paragraphs 12.4. and 12.5. are independent and cannot be combined. However, in the case of a vehicle having two steered axles an LPD shall not be required between those two axles if the longitudinal distance between their centre lines does not exceed 2100 mm."* The paragraphs 12.4 and 12.5 at UNECE Regulation No. 73 series of amendments 01 corresponds to directive 89/297/EEC paragraphs 2.4. and 2.5.

QUESTION/PROBLEM/CONCERN:

1. If an axle has 800 mm distance between tyres, is the side guard required, according to the directive 89/297/EEC?

2. If you consider that side guard is required, how long it should be?

3. Will sentence "*The requirements of paragraphs 12.4. and 12.5. are independent and cannot be combined"* at UNECE Regulation No. 73 series of amendments change the side guard requirement compared to directive 89/297/EEC?



**1. Please consider the following options A and B:**

| | | e17 | |
|---|---|---|---|
| | | Accepted | Refused |
| **A** | Yes, side guard is required | **x** | |
| **B** | No | | **x** |

**2. Minimum length of the side guard**

| | | e17 | |
|---|---|---|---|
| | | Accepted | Refused |
| **A** | No precise minimum length, but the provisions under Item 2.8 of Annex have to be met | **x** | |
| **B** | Other (please specify) | | **x** |

**3. Please consider the following options A and B:**

| | | e17 | |
|---|---|---|---|
| | | Accepted | Refused |
| **A** | No change | **x** | |
| **B** | Yes, requirement is changed | | **x** |

If you answer yes, how the requirement is changed? _____

**Comments:**

**TAAM Minutes:**
**The meeting agreed with the solution 1A (with the amendment "only for motor vehicles") and the solution 2A. For the third item there was no opinion.**

## 5.14. 2006/40/EC: Mobile Air Conditioning Systems - *Germany 3*

**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 |
|---|---|---|---|
| 1 | 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) |
| 1 | B | No, an approval of the system is not necessary. | |
| 1 | C | Yes, a type-approval of components is still possible | There are no requirements in the directive and regulation. |
| 1 | D | No, a type-approval of components is not longer possible. | |

| | |
|---|---|
| *Type approving authority "e"* | 1 |

| Selection of solution | | accepted | Refused |
|---|---|---|---|
| | **A** | X | |
| | **B** | | X |
| | **C** | | X |
| | **D** | X | |

**TAAM Minutes:**
**The meeting generally agreed with the solution 1A and 1D. Taking account of the lack of information about this very new refrigerant and its impact on the environment it is better to discuss more about this item in the next TAAM.**

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

6.1. 2002/24/EC, Article 2; 2007/46/EC, Article 12: Measures, including the withdrawal of the type-approval, to ensure that the conformity of production procedure is followed correctly - *the Netherlands 4*

| **Directive or Regulation number:** |
|---|
| **2002/24/EC Consolidated to Reg (EC) No 1137/2008 Motor Cycles & 2007/46/EC Consolidated to Commission Regulation (EU) No 371/2010 (+ Reg (EC) Nos 78/2009, 79/2009, 595/2009, 661/2009 & 2010/19) Recast Framework Directive** |
| **Subject:** |
| Measures, including the withdrawal of the type-approval, to ensure that the conformity of production procedure is followed correctly. |

| **Reference to Annex, etc in the Directive or Regulation:** |
|---|
| See text |

| **Text:** |
|---|

Article 2

Before conducting type-approval, the competent authorities in the Member State which carry out these operations shall take all necessary steps to ensure, if necessary in cooperation with the competent authorities in the Member State where manufacturing takes place or the product is brought into the Community, that there is compliance with the provisions of Annex VI in order that the new vehicles, systems, separate technical units or components manufactured, placed on the market, offered for sale or put into service, conform to the approved type.

Annex VI

1.2.5. The competent authorities …….If negative results are noted during an inspection, the competent authority must ensure that all necessary measures are taken to re-establish conformity of production as soon as possible

Article 12 of 2007/46 EC

3. When a Member State which has granted an EC type-approval establishes that the arrangements referred to in paragraph 1 are not being applied, deviate significantly from the arrangements and control plans agreed, or have ceased to be applied, although production is not discontinued, that Member State shall take the necessary measures, including the withdrawal of the type-approval, to ensure that the conformity of production procedure is followed correctly.

| **Question:** |
|---|
| Once withdrawal of his type approvals has taken place, a manufacturer has some options. One less desirable option is the easy way out. E.g. he will submit applications to another member state. Deliver the documentation required to pass initial assesment, information documents and test reports and receive type approvals for the same vehicles. In order to block this escape route from the COP part of the type approval system, it is essential that efficient and effective administrative cooperation between the member states' TAA exist. |

| **Solutions:** | | |
|---|---|---|
| A | Withdrawal of type approval communications will be placed on ETAES. A check whether a manufacturer, applying for the first time with a TAA, has a history of withdrawn type approvals in another Member State should become part of the initial assessment procedure.<br>In addition, where a manufacturer has obtained type approvals from more than one Member State, it is usefull to verify each withdrawal published on ETAES against the member state's own list of type approval holders whether it affects one of their own. This verification is also necessary to prevent the registration of vehicles accompanied by COC papers that no longer have a type approval behind them because of withdrawal.<br>Note: Manufacturers can change name, address and vehicle types, but they cannot easily change their WMI code. The WMI can therefore be very usefull in the identification process. | |
| B | A possible other solution | |

| **Decision:** |
|---|

| *Solution* | *Accepted* | *Refused* |
|---|---|---|
| A | X | |
| B | | X |

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

| **Remarks:** |
|---|
| |

**TAAM Minutes:**
**The meeting fully supports solution 1A with the amendment this solution does not replace the official procedures in force in present. It was mentioned the proposal of placing on ETAES the refusal of approvals, which was considered a good idea.**

6.2. 2002/24/EC: Battery electric vehicles with regard to specific requirements for the construction and functional safety (ECE-Regulation 100) – *Germany 4*

**Issue**

For two- and three-wheeled electric vehicles there are no requirements regarding the construction and functional safety laid down in the framework directive 2002/24/EC. Vehicles of category M and N are in the scope of ECE-Regulation Nr. 100.

For safety reasons there should be a requirement comparable to ECE-R 100 also for two- and three-wheeled vehicles. For the type-approval of any electric vehicles in Germany a confirmation about the construction and functional safety is required by the type-approval authority. We accept test reports regarding ECE-R 100 not only for M and N vehicles, but also for L category vehicles.

**Question:**

Is a confirmation about the construction and functional safety of electrical vehicles required for type-approval ? If yes, one way could be to extend the scope of ECE-R 100. (Best would be the fulfilment of series of amendment 01)

Prescription

Directive 2002/24/EC and UN/ECE Regulation 100

| Possibilities of solution | | | Comments |
|---|---|---|---|
| | A | Yes, a confirmation is required | Scope of ECE-R 100 could be extended |
| | B | No, a confirmation is not required | How is the safety of electrical vehicles granted? |

| | |
|---|---|
| *Type approving authority "e"* | 1 |

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

**TAAM Minutes:**
**Taking account of poor legislation in this field the meeting agreed to ask a confirmation or / and a test report issued on the basis of R100 ECE.**

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

7.1. 2003/37/EC, Annex III: Nominal engine power – *Austria 1*

**Background:**
Points 3.6 in the Model COC for Categories T reads:

"3.6. Nominal engine power: ..... kw at ..... min-1 (3)"

"(3) State the test method used"

Austria found different entries for the same vehicle in the COC and in the Description Documents.
Examples:
75 kW according to Directive 97/68/EC in the Description Document
80 kW according to UNECE-R120 in the COC
Engine has type approval for Category J (37 kW <= P < 75 kW) and no type approval for Category I (75 kW <= P < 130 kW)

18 kW according to Directive 97/68/EC in the Description Document

20 kW according to UNECE-R120 in the COC
Engine has no type approval according to Directive 97/68/EC

Sometimes manufacturers states the engine power according to UNECE-R24.

This different engine powers lead to misunderstandings.

**Question:**
Is it allowed to state another nominal engine power in the COC than in the description document and the base of the emission type approval?

Possibilities of solution

| | |
|---|---|
| *Type approving authority "e"* | 12 |

| **Question 1** | | accepted | refused |
|---|---|---|---|
| The engine power in the COC shall be the same like in the description document | **A** | x | |
| The engine power in the COC might differ from the value in the description document | **B** | | x |
| The engine power in the COC might differ from the value in the description document if the other test method is indicated | **C** | | x |

**TAAM Minutes: The meeting fully supports solution 1A.**

7.2. 89/173/EEC, Annex IV: Follow-up to TAAM Tallinn 27.-28.09.2007 question Spain 5 - *Finland 2*

SUBJECT: **Follow-up to TAAM Tallinn 27.-28.09.2007 question Spain 5 (89/173/EEC, Approval of agricultural couplings)**
REFERENCES (DIRECTIVE/ANNEX/ETC):

The question Spain 5 at TAAM Talllinn was:

*Directive: Approval of agricultural couplings according to 89/173/EEC, Annex IV*
*Legislation: Directive 89/173/EEC,*
*COUNCIL DIRECTIVE of 21 December 1988 on the approximation of the laws of the Member States relating to certain components and characteristics of wheeled agricultural or forestry tractors (89/173/EEC)*
*RELEVANT SECTION : Directive 89/173, Annex IV,*
*Mechanical couplings between tractor and towed vehicle and vertical load on the coupling point.*
*1 Definitions*
*1.1. Mechanical coupling between tractor and towed vehicle' means the components installed on the tractor and on the towed vehicle in order to provide the mechanical coupling between those vehicles. Only mechanical coupling components for tractors are covered in this Directive.*
*Among the various types of mechanical coupling components for tractors a basic distinction is made between:*

*- clevis type (see Figures 1 and 2 of Appendix 1),*
*- towing hook (see Figure 3 of Appendix 1),*
*- tractor drawbar (see Figure 4 of Appendix 1).*
*CONCERN: The sentence "among the various types of…" indicates that the three basic examples defined in 1.1. are only examples of coupling devices BUT NOT necessarily THE ONLY POSSIBLE MODELS to be submitted for approval.*
*Towing devices SIMILAR TO but not identical to the examples shown in the Appendix 1, (Figures 1 to 4) can give the same performance, mechanical resistance and degrees of freedom for the movement of trailer as the given examples.*
*In the concerned model (see Annex), we can consider that the basic dimensions defined in Appendix 1, Figure 4 for interchangeability with trailers are met even if the drawing is not identical.*
*The mentioned models of mechanical couplings fulfil 100% of prescriptions regarding mechanical resistance, degrees of freedom between tractor and trailer.*
*PRECEDENTS: European approvals have been granted to agricultural coupling with totally different philosophy (eg. Towing ball of Ø 80 mm not valid for towing eye)*

*QUESTION:*
*Is it possible to grant a European approval according to EEC/89/173 Annex IV to agricultural coupling devices different to those shown as examples in the figures 1 to 4 of Appendix 1 of annex IV? Annexes: Drawings in the directive and Drawings of the concerned models.*

*Possibilities of solution Comments*

*A Yes, it is possible, figures are only examples*

***B No, only to devices corresponding to the shape of given examples***

**There is a note in the meeting minutes of TAAM Tallinn: *"Decision: There was no clear TAAM consensus reached and the Commission agreed to advice."***

QUESTION/PROBLEM/CONCERN:

What is the opinion of the Commission in that question?

**TAAM Minutes:**
**The Commission had no clear answer and suggested to send the issue to the tractors group in Bruxelles . WGAT**

**8. Miscellaneous**
8.1. Short report of the ETAES-Meeting – *Germany*

**TAAM Minutes: The Chair of ETAES (Mr. Frank Wrobel) outlined the main issues of the ETAES meeting held on 22 September 2010 in Sibiu. The key points are as follows:Operation of ETAES:It was reported that ETAES is operating very well. Portugal and Hungary are the only Member States not yet included.It was noted that, whilst Italy is a member of ETAES, it is still not fully active and it will be given further encouragement to fully participate.Development of the ETAES III software is still progressing well and is planned for introduction by the end of 2010. It was explained that this new HTML based software is more sophisticated and will enable ETAES access from anywhere via the internet using a standard**

**internet browser.FinancingThe invoicing system is now in operation and the TAAM delegates were thanked for their co-operation in arranging payment. Greece has still not agreed to the financial arrangements and will therefore be given only limited access to ETAES data.DETA meeting. Work in relation to the UN ECE DETA group is ongoing and delegates from the DETA group have been given an opportunity to trial a version of the ETAES software to show how the system could work with UN ECE systems approvals. XML Sub-Group It was reported that a key activity of the XML subgroup is now the development of a master XML file that could be used to provide a common data file that can be used to provide information for several different vehicle registration and type approval applications (e.g. data for CoC, Annex III/Annex I, sound monitoring, CO2 monitoring, specific national requirements, etc.)It was explained that a master file data list will initially be put on ETAES in an Excel file format and there will be a column allocated for each Member State alongside the data list. Delegates were requested to complete their designated column to identify the specific data that they would need and, when necessary, add any missing items to the data list. Each Member State would be allocated a specific colour code so that their requirements can be easily identified. The intention would then be to develop a consolidated master file that would include all necessary fields.**
**Elimination of the need for Paper Document Exchange**

8.2. Short report of the Multi–Stage Subgroup – *Germany*

**TAAM Minutes:**
**The Chair of TAAM Multi-Stage Subgroup (Mr. Frank Wrobel) 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. It was reported that good progress has already been achieved and the draft guidelines are under preparation. It was planned that there will be one further meeting (to be held in the Sweden in February 2011) and it is intended that a final report will be available for presentation to the next TAAM in Latvia. After finalization, the guideline shall be submitted to the European Commission. The draft minutes of the last MSS meeting was distributed to TAAM delegates for information.**

8.3. ECE Regulation 14: Amount of belt slack allowed during the pull test -*United Kingdom 4*

**ECE REGULATION 14.07: SEAT BELT ANCHORAGES**

**AMOUNT OF BELT SLACK ALLOWED DURING THE PULL TEST**

**BACKGROUND**

The pull test for a seat belt anchorage approval according to ECE R14.07 requires that the seat belts are positioned around a traction device and that the belts are pulled tight prior to the application of the test load.

**LEGISLATION**

**ECE R45.07**

"6.3.4. Traction devices to be used in the tests described in paragraph 6.4. below are shown in annex 5. The devices shown in annex 5, figure 1 are placed onto the seat cushion and then, when possible, pushed back into the seat back while the belt strap is **pulled tight** around it. The device shown in annex 5, figure 2 is placed in position, the belt strap is fitted over the device and **pulled tight**. No preload beyond the minimum necessary for correct positioning of the test device shall be introduced to safety-belt anchorages during this operation.

The traction device of either 254 mm or 406 mm used at each seating position shall be such that its width is as close as possible to the distance between the lower anchorages.

The positioning of the traction device shall avoid any mutual influences during the pull test which adversely affects the load and load distribution."

## DISCUSSION

The provisions of Paragraph 6.3.4 are consistent with the characteristics of traditional seatbelts which lock the retractors during an impact and thereby hold the occupant tight into the seat

However, Load-limiting seatbelts are designed to allow some (limited) forward movement of an occupant during a frontal impact. They typically operate by having a mechanism that allows the seat belt webbing to be pulled out slightly when the load on the occupant's body becomes too high.

It has been suggested that, to replicate this extension of the webbing that occurs with load-limiting seatbelts, a certain amount of slack in the belts should be introduced before applying the load specified for the seat belt anchorage pull test.

However, this could affect the direction in which the loads are applied to the anchorages and may have a significant effect on the test results.

It would also be difficult to decide the appropriate amount of slack that should be allowed for a belt anchorage test because the actual amount by which the belt will extend in a real-life frontal impact will depend on the mass of the occupant using the seat.

Also, the deliberate introduction of some slack in the belts would seem to contradict the provisions of Paragraph 6.3.4.

VCA would therefore appreciate the opinions of the TAAM delegates regarding the meaning of the words 'pulled tight', especially when considering vehicles fitted with load-limiting seatbelts.

## QUESTION

In cases when load-limiter belts are fitted, does 'pulled tight' mean removing all the slack from the seat belts?

| Possibilities of solution | Comments |
|---|---|

| | | | |
|---|---|---|---|
| | **A** | Yes | Belts must be pulled tight and all slack removed |
| | **B** | No | For belts with load-limiters, it is permissible to leave some slack in the belts to allow for the normal forward movement that would occur during a frontal impact |

**TAAM Minutes: The meeting fully supports solution 1A.**

8.4. ECE Regulation 34: Definition of fuel tanks - *the Netherlands 3*

| **Directive or Regulation number:** |
|---|
| ECE-R34 |
| **Subject:** |
| Definition of fuel tanks |

| **Reference to Annex, etc in the Directive or Regulation:** |
|---|
| ECE Regulation 34, paragraph 10.5 |

| **Text:** |
|---|
| "Type of tank" means tanks which do not differ in such essential respects as:.<br>The structure, shape, dimensions and material (metal/plastic) of the tank(s);<br>The intended use of the tank: universal use or specific vehicle use;<br>The presence or absence of the accessories. |

| **Question:** |
|---|
| The definition "Type of tank " says there may be no differences in structure, shape, dimensions and material. RDW would like to know how strict member states deal with this definition mainly concerning the dimensions. Do they allow any difference in dimensions within one type, or does each difference in dimensions automatically lead to a new type? |

| **Solutions:** | | |
|---|---|---|
| A | yes | |
| B | no | |

| **Decision:** | | |
|---|---|---|
| *Solution* | *Accepted* | *Refused* |
| A | | |
| B | | |

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

| **Remarks:** |
|---|
| |

**TAAM Minutes: The meeting agreed with the solution A but with the amendment there must be a kind of flexibility in the approach for this matter (perhaps also the solution „case by case" could be taken into account).**

## 8.5. ECE Regulation 67: Components designed for an operating pressure (i.e. pressure under normal operating conditions) above 3 000 kPa (30 bar) - *Germany 1*

Issue

The pressure to which a component is subjected during the test is described in Regulation 67, Annex 15, section 4 thought 7. The test pressure depends on the "class" of the component and the "classification pressure". The "operating pressure" is not mentioned in the relevant tables.

Section 2.1.6 of the Regulation defines "classification pressure" as the maximum allowable operating pressure in a component according to its classification. Classification of components is done according figure 1 of the Regulation with regard to "maximum operating pressure" and function of the component. Section 2.1.6 of the Regulation defines "maximum operating pressure" to be the maximum pressure in a component which might arise during operation.

It can be taken from figure 1 of the Regulation that a component with a maximum operating pressure higher then 450 kPa (4,5 bar) – if it is not as safety valve – is classified to be "Class 1".

Section 2 of the Regulation describes four classes (1, 2, 2A and 3) with regard to pressure and function. Accordingly "Class 1" means a high pressure parts containing liquid LPG at vapour pressure or increased vapour pressure up to 3 000 kPa (30 bar).

Only in the definition of Class 3 no value for the pressure is given. The classification pressure for Class 3 is stated in the tables relevant to determine the test pressure to be 3 000 kPa (30 bar).

Components classified in the same Class are subjected to the same test pressure. The test pressure does not depend directly on the operating pressure.

The tables relevant to determine the test pressure do not state a classification pressure above 3 000 kPa (30 bar) and there is not mentioned a pressure above 3 000 kPa (30 bar) in the classification of Classes 1, 2, 2A or 3 according section 2 of the Regulation.

Question:

Is it possible to grant a type-approval for a components with a pressure under normal operating conditions above 3 000 kPa (30 bar)?

Prescription

UN/ECE Regulation 67

| Possibilities of solution | | | Comments |
|---|---|---|---|
| | A | Yes, a type-approval may be granted | The test pressure may be calculated using a factor determined from values in table 2 and table 3 of Annex 15. |
| | B | No, a type-approval may not be granted | Due to the fact that there is no classification pressure higher then 3 000 kPa (30 bar) components characterized by a operating pressure above 3 000 kPa (30 bar) can not be approved under the terms of Regulation 67. |

| | | | |
|---|---|---|---|
| | C | No, a type-approval may not be granted | as above, but it should be suggested to modify the Regulation. This would give the possibility to approve components needed for direct fuel injection engines. |

| | |
|---|---|
| *Type approving authority "e"* | 1 |

| Selection of solution | | accepted | refused |
|---|---|---|---|
| | **A** | | x |
| | **B** | X | |
| | **C** | X[1)] | |

X[1)] this one would be preferred by Kraftfahrt-Bundesamt

**TAAM Minutes:**
**Most of the delegates are in favour of solution B and C. For the solution C there are some comments: it must be check all the impacts of the increasing of pressure on the all components of LPG installations and of the infrastructure of the LPG net. There was also a point of view of the Netherlands, Spain and Hungary regarding a more flexible approach.**

8.6. ECE Regulation 107: Driver's suspension seat - *United Kingdom 3*

**ECE R107: M2/M3 GENERAL CONSTRUCTION**

**DRIVER'S SUSPENSION SEAT**

**BACKGROUND**

ECE R107 Annex 3 Section 7.7.14.7 requires that the driver's seat for all buses and coaches except Class A and B must be equipped with a suspension system.

**LEGISLATION**

**ECE R107: Annex 3**

7.7.14. Driver's seat

7.7.14.7. The seat shall be adjustable in its longitudinal and vertical positions and in its seat back inclination. It shall lock automatically in the selected position and, if fitted with a swivelling mechanism, it shall lock automatically when in the driving position. **The seat shall be equipped with a suspension system**

7.7.14.7.1. The suspension system and the vertical position adjustment are not mandatory for vehicle of Class A or B.

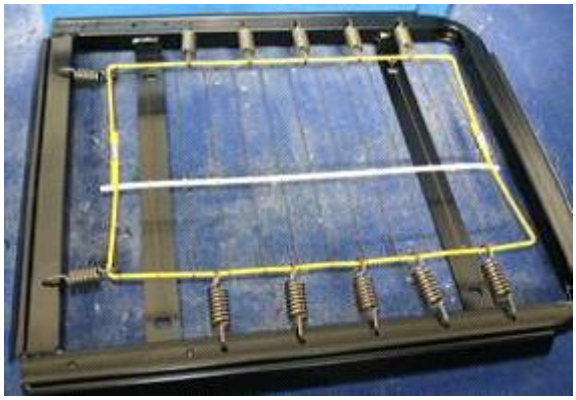
## DISCUSSION

VCA considers that the words 'the seat shall be equipped with a suspension system' mean that the driver's seat must have a system that provides suspension for the complete seat frame not just the seat cushion area, as shown in the following examples:

Seat with mechanical suspension

Seat with air suspension

However, we have been requested by one seat manufacture to accept the principle that the required seat suspension system can be achieved by simply providing a suspended seat cushion within a fixed seat frame as follows:



In our opinion, this is just a normal sprung seat cushion base which can be found in many vehicle seats and it does not qualify as a seat that is 'equipped with a suspension system'.

However, we accept that there is no formal definition of a suspension seat in ECE R107 and we therefore seek TAAM guidance.

**QUESTION**

Do the words 'the seat shall be equipped with a suspension system' mean that the driver's seat must have a system that provides suspension for the complete seat frame and not just the seat cushion area?

| Possibilities of solution | | | Comments |
|---|---|---|---|
| | **A** | 'The seat shall be equipped with a suspension system' means that the driver's seat must have a system that provides suspension for the complete seat frame and not just for the seat cushion area | Most vehicle seats have some form of suspended seat cushions. The conventional view of a 'suspension seat' is that the full seat frame itself is suspended |
| | **B** | It is acceptable for just the seat cushion to be suspended in a fixed seat frame | There is no formal definition of a seat suspension system in R107 |

**TAAM Minutes:**
**The meeting fully agreed with solution A.**

8.7. ECE Regulation 117: Interpretation test result wet-grip values - *the Netherlands 5*

| **Directive or Regulation number:** |
|---|
| ECE R117 |

| **Subject:** |
|---|
| Interpretation test result Wet-grip values. |

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

| **Text:** |
|---|
| |

| **Question:** |
|---|
| If a test value would be in three decimals, would the final result be rounded off?<br><br>Example: test result wet grip value: 1.085. Limit value: 1.1<br>Final result: 1.1 (Pass) or 1.085 (Fail)<br><br>ECE R117 rules interpretation of test results for sound values: to be rounded off.<br>ECE R117 does not offer such an interpretation for wet-grip values.<br>ECE R117 specifies limit values for wet-grip to one decimal. |

| **Solutions:** | | |
|---|---|---|
| A | Final result rounded off to one decimal. | |
| B | Final result not rounded off. | |

| **Decision:** | | |
|---|---|---|
| *Solution* | *Accepted* | *Refused* |
| A | | |
| B | | |

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

| **Remarks:** |
|---|
| |

**TAAM Minutes:**
**The meeting agreed with solution B, the issue being a safety one.**

8.8. Information from Switzerland: Acceptance of approvals „e14“ - *Switzerland info*

**TAAM Minutes:**
**The delegate of Switzerland informed the meeting about the agreement received from DG Enterprises Automotive Industry allowing Switzerland to issue EC type approvals and EC systems components approvals, under the code e14.**

8.9 Question about of COP procedure and initial assessment procedure – Sweden

The COP procedure must be done by the type approval authority or, at the request of the manufacturer, can be done by a certain technical service / body?

**TAAM Minutes:**
**The meeting support the solution the above procedures must be done by the approval authority or by technical bodies appointed by the type approval authority.**

8.10 a short presentation by Germany of the joy-stick control device of the steering system used for the disabled people vehicles

**The German delegation presented the joy-stick device for steering. They will ask every authority about the national requirements for such devices. Also they underline the importance of checking the category of driving license for vehicles steered by such devices.**

8.11 Romania ask for a "tour de table" about issuing EC type a approvals for M1 vehicles produced in China

**TAAM Minutes:**
**Just few countries have issued such approvals: the Netherlands, Italy, Spain, UK, Luxembourg, Romania and Germany (only for components)**

**9. Future Meetings**

9.1. 2011 Q1/Q2: Latvia

**TAAM Minutes:**
**It was confirmed that the next TAAM will be held in Latvia on 11 and 14 May 2011 (Riga).**

9.2. 2011 Q3/Q4:

**TAAM Minutes:**
**There are no volunteers for the meetings to be held in Q3 /Q4 2011, yet.**