TYPE APPROVAL AUTHORITIES MEETING

26 & 27 APRIL 2012 - BRATISLAVA, SLOVAKIA

MEETING MINUTES
(Version 3)

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TYPE APPROVAL AUTHORITIES MEETING

26 & 27 April 2012 – Bratislava, Slovakia

- held in: *Hotel Bôrik*, Bôrik 15, SK-814 07 Bratislava

ATTENDEES

Austria	Mr Franz Wurst
Belgium	Mr Wim Vandenplas Mr Patrick De Valk Mr Alain Descamps
Bulgaria	Mrs Tsvetelina Ilieva-Yordanova Ms Galya Stoeva Mr Ivaylo Slaveykov
Croatia	Mr Boris Gorup Mr Tonko Županić
Cyprus	Not represented
Czech Republic	Mr Lubomír Kincl Mr Martin Tichý
Denmark	Not represented
Estonia	Mr Jürgo Vahtra
European Commission	Not represented
Finland	Mr Marko Sinerkari Mr Jukka Vedenoja
France	Mr Pierre Bazzuchi Mr Matthieu Desinde Mrs Séverine Guillaume
Germany	Mr Frank Wrobel Mr Mark Wummel
Greece	Not represented
Hungary	Ms Erika Nemeth Mr Tamás Kovács
Iceland	Mr Einar Einarsson
Ireland	Not represented
Italy	Not represented
Latvia	Mr Valdis Blekte Mr Janis Liepins

Lithuania	Mr Justas Rašomavičius Mr Virginijus Čiškauskas
Luxembourg	Mr Claude Liesch Mr Romain Lamberty
Malta	Not represented
The Netherlands	Mr Harry Jongenelen Mr Jan Muns
Norway	Mr Einar Årdalsbakke Ms Unni Eik Augland
Poland	Mr Jerzy W. Kownacki Mr Michal Domanski
Portugal	Not represented
Romania	Mr Bogdan Toader
Slovakia	Mr Marek Hudec (chairman) Mr Štefan Gajdoš Mr Ľubomír Moravčík Mr Ján Javorčík
Slovenia	Mr Joze Trselic
Spain	Mr Ignacio Blanco Mr Lluis Sans
Sweden	Mrs Tanja Vainionpää Mr Bo Nilsson
Switzerland	Mr Stefan Wenger
Turkey	Not represented
United Kingdom	Mr Tony Stenning Mr Derek Lawlor
UNECE	Not represented

AGENDA

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3. Adoption of the minutes from Geneva

3.1.	Minutes from Geneva, Switzerland (21 – 22 November 2011)	*Netherlands,UK*
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4. Follow up on actions from the previous meetings

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4.2.	Geneva Agenda item 5.2.: Regulation (EC) 385/2009: Type 1 Test Results in COC	*Austria*
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4.5.	Geneva Agenda item 5.14.: Directive 77/649/EEC and ECE R125: Forward vision	*United Kingdom*
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5. Items relating to Framework Directive 2007/46/EC (Motor Vehicles)

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5.2.	Consolidated Resolution on the Construction of Vehicles (R.E.3), Annex 2: Proposal for guidelines on measures ensuring the audibility of hybrid and electric vehicles	*Germany 2*
5.3.	Directive 2007/46/EC: Date of entry of requirements for individual approvals	*Netherlands 1*
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5.7.	Directive 2007/46/EC: Ambulances	*Slovakia 2*
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5.9.	Directive 2007/46/EC: 2nd stage approval based on a 1st stage small series approval	*Luxembourg*
5.10.	Directive 2007/46/EC: Multi-stage approval	*Slovakia 3*
5.11.	Regulation (EC) 715/2007, Directive 2007/46/EC: Engine capacity	*Romania 4*
5.12.	Regulation (EC) 715/2007, Regulation 692/2008: Access to vehicle OBD and vehicle repair and maintenance	*Netherlands 2*
5.13.	Directive 71/320/EC: Air reservoir axle	*France 2*
5.14.	Regulation (EU) 19/2011: Statutory plates	*Poland 1*
5.15.	ECE R48: Stop lamp	*Netherlands 3*
5.16.	ECE R48, Directive 76/756/EC: Trailers used for road maintenance purposes	*Czech Republic*
5.17.	ECE R7: Front and rear position lamps	*Poland 2*
5.18.	Directive 91/226/EC, Regulation (EU) 109/2011: Spray-Suppression Systems	*Belgium*
5.19.	Directive 92/23/EC, Directive 2007/46/EC: Tyres & load capacity on M3 class II vehicles	*France 1*
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MEETING QUESTIONS AND NOTES

1. OPENING OF THE MEETING

TAAM Minutes:

The delegates were welcomed to Bratislava by Mr. Marek Hudec who also chaired the meeting. The chairman specially welcomed the delegates of Croatia who attended the meeting for the first time.

2. ADOPTION OF THE AGENDA

TAAM Minutes:

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

Agenda Item no. 4.8.: Geneva Agenda item 5.10.: Directive 2007/35/EC amending Directive 76/756/EEC (need to be re-discussed according to minutes from Geneva TAAM) - Netherlands

Agenda Item no. 8.3.: Supervising of testing - Poland

3. ADOPTION OF THE MINUTES FROM GENEVA

3.1. Minutes from Geneva, Switzerland (21 – 22 November 2011)

The Netherlands, UK

TAAM Minutes:

The final version of the Meeting Minutes of 12 April 2012 from the previous TAAM meeting held in Geneva, Switzerland on 21-22 November 2011 has been circulated among the TAAM delegates before the Bratislava TAAM Meeting.

Mr. Jongelenen (NDL), as one of the authors of the Geneva Meeting Minutes, remarked that there were only few comments (to the item no. 4.2., no. 5.7. and no. 5.10) and these were incorporated. Agenda Item no. 5.10. from Geneva meeting was added as Agenda Item no. 4.8. of this meeting to re-discuss.

The final version of the minutes from the previous TAAM meeting was adopted without amendment.

3.2. TAAM Minutes forwarding to the Commission and TAAEG

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

Outcome: TAAEG informed that Commission will no longer be attending the TAAM and the minutes will no longer be uploaded onto the Commission website. The Riga minutes has therefore not been forwarded to the Commission.

The Geneva meeting secretariat agreed to prepare a summary document to highlight for the Commission the key action points arising from the TAAM minutes:

Outcome: No longer required (see above) but this summary still completed to facilitate identification of carry over items for Agenda in Bratislava.

Discussion, suggestions from TAAM delegates how to treat with TAAM Minutes and other summaries from TAAM meetings.

TAAM Minutes:

Germany reminded again that the Commission will no longer be participate at the TAAM and the Meeting minutes will no longer be uploaded onto the Commission website. However, Germany opined that the invitation e-mails should be sent to the Commission because of new colleagues who will possibly attend the meeting and at least the Meeting minutes should be sent.

United Kingdom suggested sending only the summary document with action key points from the TAAM minutes to the Commission.

France pointed out that only points of the Agenda that are not clarified during the TAAM shall be sent to the TAAEG.

Germany proposed to create a section under the ETAES and to upload the Meeting minutes there, but in such case the minutes will be available only for TAA (due to access secured by login name and password).

Delegates suggested to create a website "www.taam.eu" where the Meeting minutes will be uploaded and will be available also for public (manufacturers, technical services, etc.). As such website has been already registered by the Slovenia for the purposes of TAAM in Brdo (October 2009), Slovenia will find out the possibilities of restoration of this website and will send the information via e-mail.

This item should be discussed again at the next TAAM.

4. FOLLOW UP ON ACTIONS FROM THE PREVIOUS MEETINGS

4.1. Geneva Agenda item 4.8, Riga Agenda item 5.24: ECE R13: R13 test reports according annexes 19-21

Germany

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.

Type approving authority "e"	1

Selection of solution		accepted	Refused
	1	X	
	2	X	
	3	X	
	4	X	
	5	X	

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.

Minutes from Geneva TAAM:
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.

TAAM Minutes:

GRRF has not received any conclusion yet, so the question will remain on the next TAAM agenda.

4.2. Geneva Agenda item 5.2.: Regulation (EC) 385/2009: Type 1 Test Results in COC

Austria

Regulation 385/2009: Type 1 Test Results in COC

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 ([1])
CO: ..... HC: ..... NO x : ..... HC + NO x : ..... Particulates: .....
Smoke opacity (ELR): ..... (m^{-1})
1.2. test procedure: Type I (Euro 5 or 6 ([1]))
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.

Type approving authority "e"	12

Solution	accepted	refused
A	x	
B		X
C		X

Minutes from Geneva TAAM:

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.

TAAM Minutes:

According the Geneva Meeting minutes the meeting clearly agreed with Solution A. Austria provided several additional information concerning this topic and the item can be deleted from the TAAM Agenda.

4.3. Geneva Agenda item 5.5.: ECE R103 and Regulation (EC) 715/2007: Replacement pollution control devices, Particulate filters Provisions for testing

Germany

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.

Type approving authority "e"	1

Selection of solution		accepted	Refused
	1	X	
	2		X

Annex: UN R 103 (suppl.3)

ECE/TRANS/WP.29/2010/131
……
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.

Minutes from Geneva TAAM:

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.

TAAM Minutes:

Germany stressed the necessary of testing and observation of the new parts added to antipollution system. French delegation informed that the topic was progressed to GRPE, but they have not received the outcome yet.

German delegation together with French delegation agreed to prepare additional proposal for GRPE.

This question will remain on the TAAM Agenda.

4.4. Geneva Agenda item 5.6.: Regulation (EC) 715/2007 and ECE R83.06: Engine setting for Type I test

United Kingdom

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 recognize 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
A	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	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 environmentally beneficial setting
C	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.

Minutes from Geneva TAAM:

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.

TAAM Minutes:

United Kingdom suggested to postpone the discussion to this topic to the next TAAM.

4.5. Geneva Agenda item 5.14.: Directive 77/649/EEC and ECE R125: Forward vision

United Kingdom

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_1, and above three planes through V_2, 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
A	Only one pillar should be called the A pillar, and no other pillars are permitted. Window division bars can be **only** non-load bearing elements that simply seal the gap between 2 panes of glazing.	Some current approved designs would no longer be acceptable.
B	Multiple A pillars are permitted but all must be included in the measurement of A pillar obscuration. Window division bars can be **only** non-load bearing elements that simply seal the gap between 2 panes of glazing.	Some current approved designs would no longer be acceptable.
C	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.
D	Another solution?	

Minutes from Geneva TAAM:

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.

TAAM Minutes:

At GRSG there were proposed by Japan delegation the requirements for testing of such A pillars and discussions still go on.

UK delegation suggested to delete this topic from the Agenda. After the outcome from GRSG will be reached, then the solution will be reported to all TAAM delegates.

This topic will be deleted from the TAAM Agenda.

4.6. Geneva Agenda item 8.2.: Final guidelines of the Multi-Stage Subgroup for the Processing of Multi Stage Approvals

Germany

TAAM Minutes:

Mr. Wrobel (GER), Chair of the Multi-Stage Subgroup, presented their work. The guideline for process of the Multi-Stage Approvals is finalized. Latest version of the guideline is in Annex I of this Meeting minutes.

Slight changes will touch the Point 4.15 concerning updating of the 2nd (3rd, etc.) stage type approval after the extension of the base vehicle type approval. The proposal is to allow following stage manufacturer so that he does not need to update his type approval if the changes of base vehicle do not hit the following stage approval.

Mr. Wrobel noticed that the guideline is not a law or legal act, it is only the recommendation for better understanding of the Multi-Stage Approvals.

Remarks from this TAAM discussions will be also incorporated in to the guideline (see Item no. 5.8. – 5.10.).

4.7. Geneva Agenda item 8.3.: Final report of the GSR Subgroup

United Kingdom

TAAM Minutes:

Mr. Stenning (UK), Chair of the informal TAAM GSR Subgroup, outlined key points from all three meetings of GSR Subgroup (Meeting 1: 18-19 August 2011 – Bristol; Meeting 2: 12-13 January 2012 – Flensburg; Meeting 3: 8 March – Paris).
For full details see the "Consolidated Meeting Notes for TAAM GSR Subgroup Meetings 1, 2 and 3" that are annexed to this TAAM report (see Annex II).

4.8. Geneva Agenda Item 5.10.: Directive 2007/35/EC amending Council Directive 76/756/EEC

Netherlands

Text:
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.

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.

How have other countries dealt with that situation?

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 typeapprovals will be no longer valid without the adaption.		

Decision:			
Solution	*Accepted*	*Refused*	
A			
B			

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

Remarks:

Minutes from Geneva TAAM:
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.

In the context of 2007/46/EC Article 14 Paragraph 4, Solution A should be the only conclusion.
To be re-discussed at the next TAAM

TAAM Minutes:

Delegates agreed with Solution A.
This topic will be deleted from the TAAM Agenda.

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

5.1. Un-Regulations, series of amendment, supplement, communication form

Germany 1

Issue/Information:

For several UN-Regulation, especially those for parts (e.g. Regulation 7) the series of amendment can be seen on the communication form, but not the supplement to the series of amendments. Sometimes there are transitional provisions introduced with a supplement to a series of amendments (e.g. supplement 6 to the 02 series of amendments of Regulation 7).

In this case it is important for the system-approval as well as for a WVTA of a vehicle that the type-approval authority is able to get the information about the supplement. Therefore this information is required at least in the respective test report.

What is the opinion of other TAA?

Possibilities of solution			Comments
	A	The type-approval documentation needs to state the amendment level/supplement number	
	B	At least the test report has to inform about the supplement.	

Type approving authority "e"	1

Selection of solution		accepted	refused
	A	x	
	B	x	

TAAM Minutes:

The meeting agreed with Solution B. Also putting the supplement to the series of amendments of Regulations into the item "Remarks" on the Communication (Type approval certificate) is acceptable.

5.2. Consolidated Resolution on the Construction of Vehicles (R.E.3), Annex 2: Proposal for guidelines on measures ensuring the audibility of hybrid and electric vehicles

Germany 2

Issue/Information:

The above mentioned guideline will also be part of the commission proposal for a new regulation concerning the sound level of vehicles (18633/11, 14.12.2011).
This guideline addresses Acoustic Vehicle Alerting Systems (AVAS) for hybrid and electric vehicles. According to this guideline an AVAS **may** be fitted to a vehicle and the system **may** also be equipped with a **"pause switch"**.

Question to the TAAM delegates:

Is there any additional national law or requirement in your country applicable that may overrule this guideline? Especially according the "pause switch", is there any rule that makes this "pause switch" compulsory or that prohibits this "pause switch"?

Annex 2 of R.E.3 reads:

"Proposal for guidelines on measures ensuring the audibility of hybrid and electric vehicles

Preamble

The environmental benefits expected to be achieved by hybrid electric and pure electric road transport vehicles (HEV and EV) have resulted in vehicles becoming quiet. This has resulted in the removal of an important source of audible signal that is used by pedestrians (e.g. blind and low vision pedestrians) and road users (e.g. cyclists), to signal the approach, presence or departure of these vehicles.

The guideline is intended to present recommendations to manufacturers for a system to be installed in vehicles to provide vehicle operation information to pedestrians and vulnerable road users.

This guideline is intended as interim guidance until the completion of on-going research activities and the development of globally harmonized device performance specifications.

Scope

This guideline addresses Acoustic Vehicle Alerting System (AVAS) for hybrid electric and pure electric road transport vehicles (HEV and EV).

A. Acoustic Vehicle Alerting System

1. Definition
Acoustic Vehicle Alerting System (AVAS) is a sound generating device designed to inform pedestrians and vulnerable road users.

2. System performance
AVAS is intended to be fitted to a vehicle.
AVAS shall fulfil the requirements set forth below.

3. Operation conditions
(a) Sound generation method
The AVAS shall automatically generate a sound in the minimum range of vehicle speed from start up to approximately 20 km/h and during reversing, if applicable for that vehicle category. In case the vehicle is equipped with an internal combustion engine that is in operation within the vehicle speed range defined above, the AVAS may not need to generate a sound.
For vehicles having a reversing sound warning device, it is not necessary for the AVAS to generate a sound during backup.

(b) Pause switch

The AVAS may have a switch to stop its operation temporarily ("pause switch").

If a pause switch is introduced, however, the vehicle should also be equipped with a device for indicating the pause state of the vehicle approach informing device to the driver in the driver's seat.

The AVAS should remain capable of re-operating after stopped by a pause switch.

If fitted in the vehicle, a pause switch should be located in such a position that the driver will find and manipulate it with ease.

(c) Attenuation
The AVAS sound level may be attenuated during periods of vehicle operation.

4. Sound type and volume
(a) The sound to be generated by the AVAS should be a continuous sound that provides information to the pedestrians and vulnerable road users of a vehicle in operation.
However, the following and similar types of sounds are not acceptable:
(i) Siren, horn, chime, bell and emergency vehicle sounds
(ii) Alarm sounds e.g. fire, theft, smoke alarms
(iii) Intermittent sound

The following and similar types of sounds should be avoided:
(iv) Melodious sounds, animal and insect sounds
(v) Sounds that confuse the identification of a vehicle and/or its operation (e.g. acceleration, deceleration etc.)

(b) The sound to be generated by the AVAS should be easily indicative of vehicle behaviour, for example, through the automatic variation of sound level or characteristics in synchronization with vehicle speed.

(c) The sound level to be generated by the AVAS should not exceed the approximate sound level of a similar vehicle of the same category equipped with an internal combustion engine and operating under the same conditions.

Environmental consideration:

The development of the AVAS shall give consideration to the overall community noise impact."

TAAM Minutes:

In generally the Member States do not have addition national requirements concerning the AVAS except Spain where national regulation is established. In United Kingdom, the current law allows a reversing alarm (AVAS) only on a bus, on a goods vehicle with a maximum gross mass of not less than 2000kg, and on some mobile machinery. The situation in the Netherlands is similar as in the United Kingdom, however the AVAS will be informally tolerated in the national in use requirements.

5.3. Directive 2007/46/EC: Date of entry of requirements for individual approvals

Netherlands 1

Directive or Regulation number:
Directive 2007/46/EC
Subject:
Date of entry of requirements for individual approvals

Reference to Annex, etc in the Directive or Regulation:
Article 24 Individual approvals

Text:
Article 24 Individual approvals 1. Member States may exempt a particular vehicle, whether unique or not, from compliance with one or more of the provisions of this Directive or with one or more of the regulatory acts listed in Annex IV or Annex XI, provided that they impose alternative requirements. ……

Question:
The classic formulation of EC directives contains 3 dates: - As from the first date national authorities have to grant and accept approvals when the new provisions are met (we call this the X-date); - As from the second date national authorities shall only grant new type approvals if the new provisions are met (we call this at RDW the Y-date) and - As from the third date no new vehicles may be registered when they do not meet the new provisions (which we call the Z-date). Netherlands uses the Y-date for an individual approval. Which option do you prefer?

Solutions:			
A	Member State is deciding		
B	Y-date		
C	Z-date with the consequence that in the absence of the Z-date , for a number of issues not a requirement is used		

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

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

Remarks:

TAAM Minutes:

Netherlands, Germany and Belgium were in favour of Solution B and Austria, Spain, Finland, Latvia and Estonia preferred Solution C.

5.4. Directive 2007/46/EC: Single-axle semitrailer

Slovakia 1

Directive or Regulation number:
2007/46/EC
Subject:
Single-axle semitrailer

Reference to Annex, etc. in the Directive or Regulation:
Directive 2007/46/EC

Text:
DA Semi-trailer – a trailer which is designed and constructed to be coupled to a tractor unit or to a converter dolly and to impose a substantial vertical load on the towing vehicle or on the converter dolly. The coupling to be used for a vehicle combination shall consist of a king pin and a fifth wheel. Four-axle vehicle (chassis) is completed as a tractor by mounting saddle plate – fifth wheel JOST. Single-axle trailer with self-steering axle is connected via king pin and fifth wheel with the tractor, but the trailer is not in swivel type connection. The trailer is only connected in fifth wheel, but the mass of the trailer and of the load is transmitted via fifth wheel and its chassis, too. (see video and pictures in remarks) The reasons of such vehicle combination are that according to Dir. 96/53/EC a four-axle motor vehicle is limited in 32 tonnes of maximum authorized vehicle mass, while vehicle combination with semi-trailer is limited in 40 tonnes of maximum authorized vehicle mass. It makes 8 tonnes difference in behalf of vehicle combination by a transport with one vehicle.

Question:
1. Can be such semi-trailer considered as vehicle of category O according to Dir. 2007/46/EC? 2. It is possible to grant an EC-type approval according to Dir. 2007/46/EC?

Solutions:	
1A	Yes
1B	No

Solutions:	
2A	Yes
2B	No

Decision		
Solution	Accepted	Refused
1A		
1B		
2A		
2B		

Authority:	
Type approval Authority e/E	**27**

Remarks:
http://www.youtube.com/watch?v=HcZfQvnodWw&feature=player_embedded# http://www.youtube.com/watch?v=lzfJmQKKuHA&feature=player_embedded#


CELKOVÁ NOSNOSŤ SÚPRAVY - 40t OBJEM 20 m³
UŽITOČNÉ ZAŤAŽENIE - 22t
VS-mont

TAAM Minutes:

As such semi-trailer does not fulfill basic definitions of an O category vehicle and principles of the vehicle combinations, the meeting agreed with Solutions 1B and 2B.

5.5. Directive 2007/46/EC: Seating positions, COC

Sweden

SUBJECT: Seating positions, CoC
DIRECTIVE: 2007/46
RELEVANT SECTION: Annex IX, items 0. and 42.

0. OBJECTIVES
The certificate of conformity is a statement delivered by the vehicle manufacturer to the buyer in order to assure him that the vehicle he has acquired complies with the legislation in force in the European Union at the time it was produced.

The certificate of conformity also serves the purpose to enable the competent authorities of the Member States to register vehicles without having to require the applicant to supply additional technical documentation.

For these purposes, the certificate of conformity has to include:
(a) the Vehicle Identification Number;
(b) the exact technical characteristics of the vehicle (i.e. it is not permitted to mention any range of value in the various entries).
---
42. Number of seating positions (including the driver) (k): .....

(k) Excluding seats designated for use only when the vehicle is stationary and the number of wheelchair positions. For coaches belonging to the vehicle category M 3 the number of crew members shall be included in the passenger number.

Issue:

M_1 vehicles with body-work code AF (MPVs) can be delivered without all possible seats installed depending on the configuration ordered by the customer. According to both the former and the new version of annex II a seating position is to be determined by the presence of seat anchors. On the other hand item 0. of annex IX states that the information of the CoC should be an exact description of the individual vehicle, i.e the actual number of seats.

In Sweden the registered number of seating positions are crucial information when it comes to the periodical roadworthiness test as seat belts shall be inspected for all the registered seating positions according to 2009/40/EC. If the registered information is for the possible maximum seating anchorages and the vehicle has less seats installed the vehicle is not approved.

Question:
Based on item 0., should the number of seating positions given under item 42 be the number of actual seats mounted in the vehicle or the number of seat anchors?

	Selection of solution	Accepted	Refused
A	Item 42. on the CoC should be the number of actual seats mounted in the vehicle.		
B	Item 42. on the CoC should be the number of seat anchors.		

Type Approval Authority	**e5**	A	B

TAAM Minutes:

During the discussion some delegates supported Solution A and some delegates Solution B. However, the Point 2.1.5. of the Annex II is clear, therefore meeting agreed with Solution B.

5.6. Directive 2007/46/EC: Mobile Air Conditioning for Special Purpose Vehicle

United Kingdom 1

Mobile Air Conditioning for Special Purpose Vehicles

LEGISLATION

Item	Subject	M1 ≤ 2 500 ([1]) kg	M1 > 2 500 ([1]) kg
61	Air-conditioning system-Directive 2006/40/EC	X	X

X No exemptions except those specified in the regulatory act.

G 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.

Discussion

Here we see an "X" for M1 >2500 kg. These converters build on N1 class III and N2 and these vehicles are not in the scope of the MAC directive. So we could see conversions on these categories that have an A/C system, but no approval to the base vehicle, yet require an approval to get WV for a SPV.

We understand that the Commission has indicated that this requirement was an editorial error and that the X should have been G.

Question?

Will member states accept that for M1 SPV the requirements as laid out in "G" above will be acceptable?

Option	Possible Solution	Comments
A	**Yes**	
B	**No**	

TAAM Minutes:

The discussion showed that most of the delegates are in favour of replacing of the letter "X" by the letter "G". Also according to the Report of 2nd TAAEG Meeting (6 June 2011) the Commission indicated that this is an error (see Annex III), but no legal correction/change has been made yet.

As the conclusion was not reached at the meeting, the Chairman proposed to prepare a letter to the Commission for clarification of this situation and this item should be discussed again at the next TAAM.

5.7. Directive 2007/46/EC: Ambulances

Slovakia 2

Directive or Regulation number:
2007/46/EC, 678/2011
Subject:
Ambulances

Reference to Annex, etc. in the Directive or Regulation:
Directive 2007/46/EC - Annex II, Part A, Point 5.3, Regulation (EU) 678/2011 – Article 3 (1)

Text:
According to the definitions in Dir. 2007/46/EC: "Ambulance (SC)" is a vehicle of category M intended for the transport of sick or injured persons and having special equipment for such purpose. The patient compartment shall comply with the technical requirements of Standard EN 1789:2007 on "Medical vehicles and their equipment – Road ambulances" with the exception of Section 6.5 "List of equipment". Regulation (EU) 678/2011 – Article 3 (1): It shall apply to new vehicle types for which approval will be granted on and after 29 October 2012. Amendment of Dir. 2007/46/EC sets the ambulance is vehicle that have to comply the technical requirements of Standard EN 1789 from 29 October 2012. Before 29 October 2012 ambulance does not comply the technical requirements of Standard EN 1789.

Question:
1. After 29 October 2012 can the approval be granted only if the manufacturer of the complete vehicle or completed vehicle have a certificate of conformity according to EN 1789? 2. Will the approvals granted before 29 October 2012 remain valid after 29 October 2012, although the ambulances will not comply the requirements according to EN 1789 and will not have the certificate of conformity according to EN 1789? 3. Will be the COC valid after 29 October 2012, if ambulance will not comply the requirements according to EN 1789 and will not have the certificate of conformity according to EN 1789?

Solutions:	
1A	Yes, certificate of conformity according to EN 1789 is necessary.
1B	No.
1C	Other

Solutions:	
2A	Yes, ambulances will not comply the requirements according to EN 1789 and will not have a certificate of conformity according to EN 1789.
2B	No, ambulances will have to comply the requirements according to EN 1789 and will have to have a certificate of conformity according to EN 1789.

Solutions:	
3A	Yes, COC will be valid
3B	No, COC will not be valid

Decision		
Solution	Accepted	Refused
1A	X	
1B		X
1C		X
2A		X
2B	X	
3A		X
3B	X	

Authority:	
Type approval Authority e/E	**27**

Remarks:

TAAM Minutes:

It was clarified that according the new Annex II the requirements are applicable only for new types and also it was remarked that Standard EN 1789:2007 is only the standard for testing, not the law/legal act.

The meeting agreed with Solutions 1B, 2A and 3A. German delegation noted that in a little bit more precise way that the conformity with the EN 1789 is only necessary for new types! So answer 1A only for new types and 1B for the existing ones using the old Annex II.

5.8. Directive 2007/46/EC: Comments about multi-stage approval procedure

Romania 5

Comments about multi-stage approval procedure
Subject: Annex XVII
Legislation (directive / regulation / etc.): directive 2007/46/CE

Text:

Annex XVII

1.1. The satisfactory operation of the process of multi-stage EC type-approval requires joint action by all the manufacturers concerned. To this end approval authorities must ensure, before granting first and subsequent stage approval, that suitable arrangements exist between the relevant manufacturers for the supply and interchange of documents and information such that the completed vehicle type meets the technical requirements of all the relevant regulatory acts as prescribed in Annex IV or Annex XI. Such information must include details of relevant system, component and separate technical unit approvals and of vehicle parts which form part of the incomplete vehicle but are not yet approved.

Comments:: the problem has already been discussed by the TAAM but we want to present some facts of our short experience in the field of multi-stage approval.

Receiving some applications from manufacturers established in UE (Romanians too) we have noticed they have quite a lot of difficulties in fulfilling the provisions of Annex XVII (taking into account the guide lines issued by TAAM M-S subgroup after the meeting of Koln April 2011). As we expected, to deal with the base vehicles manufacturers, which are in general big companies, is very difficult. Our clients hit a wall of bureaucracy which is hard to pass over and in many cases is counter-productive. In some cases we have received the information the base vehicles manufacturers know a few things about the provisions of Annex XVII.

It is possible we understand to strictly the text and the guide lines but being at the beginning of the activity we are cautious to not miss something essential.

For instance: it is possible to accept an agreement issued by the representative of the manufacturer? If the answer is yes, how do we know the representative is allowed to issued such an agreement?

We ask a new discussion on this issue.

Thank you!

TAAM Minutes:

General problem by Multi-Stage Approval for small and middle 2nd/next stage manufacturers is difficult or impossible to obtain an agreement according to Annex XVII from the base vehicle manufacturer. The proposal of Romania was to simplify the access to the approval documentation of base vehicle manufacturer for 2nd/next stage manufacturers, for example via the ETAES.

The German delegations indicated that for now the ETAES is available only for TAA and referred to using of the Multi-Stage Approvals Guidelines (see Agenda Item no. 4.6.). Other delegations stressed that Annex XVII clearly states that the suitable arrangements should exist between the relevant manufacturers for the supply and interchange of documents and information. Multi-Stage Approvals Guidelines also deals with such cases and allows to use national representatives (national manufacturer's representatives) as the contact element empowered by the base vehicle manufacturer in the chain *"base vehicle manufacturer"-"national manufacturer's representatives"-"next stage manufacturer"*.

5.9. Directive 2007/46/EC: 2nd stage approval based on a 1st stage small series approval

Luxembourg

Directive:	**2007/46/EC (framework directive)**
Subject:	**2nd stage approval based on a 1st stage small series approval**

Question 1:
Is it possible to issue a 2nd stage approval based on 1st stage small series approval?

possible solution:	
YES, it is possible to issue a 2nd stage approval based on 1st stage small series approval	**A**
NO, it is not possible to issue a 2nd stage approval based on 1st stage small series approval	**B**

Question 2:
If YES, do all the subsequent stages need to be also small series approvals or can they be unlimited approvals?

possible solution:	
YES, all subsequent approvals in multistage procedure which are based on a small series approval must be small series approvals themselves.	**C**
NO, subsequent approvals in multistage procedure which are based on a small series approval can be unlimited approvals as the first stage approval automatically limits the number of vehicles that can be build.	**D**

		accepted	**refused**
selection of solution:	**A**		
	B		
	C		
	D		

TAAM Minutes:

The meeting agreed with Solution A and Solution C.

If for the base vehicle is issued 1st stage small series EC-type approval, vehicle does not fulfill all technical requirements set by Annex IV. Therefore 2nd stage should be also approved as a small series EC-type approval in order it will evident that completed vehicle does not fulfill technical requirements and has some exemptions.

Also it makes no sense to apply for 2nd stage large series EC-type approval, as the number of base vehicles is limited by the Annex XII. Numbering of the COC in small series provides better control of the number of completed and registered vehicles. For 2nd stage manufacturer would be very difficult to comply with Annex IV, if the base vehicle has a small series EC-type approval.

5.10. Directive 2007/46/EC: Multi-stage approval

Slovakia 3

Directive or Regulation number:
2007/46/EC
Subject:
Multi-stage approval

Reference to Annex, etc in the Directive or Regulation:
Directive 2007/46/EC - Article 3 (7); Annex XVII

Text:
'Multi-stage type-approval' means the procedure whereby one or more Member States certify that, depending on the state of completion, an incomplete or completed type of vehicle satisfies the relevant administrative provisions and technical requirements of this Directive. A vehicle type shall consist of vehicles which have all of the following features in common: the manufacturer´s company name etc.

Question:
1. Is it possible in multi-stage type approval process to grant a type approval for completed vehicle, which consist of more than one type of the base vehicles? (see remarks)
2. Is it possible in multi-stage type approval process to grant type approval for completed vehicle, which consist of more than one type of the base vehicle and the manufacturers are also different? (see remarks)

Solutions:	
1A	Yes
1B	No. Two separate type approvals for completed vehicle have to be granted.

Solutions:	
2A	Yes
2B	No. Two separate type approvals for completed vehicle have to be granted.

Decision		
Solution	Accepted	Refused
1A		X
1B	X	
2A		X
2B	X	

Authority:	
Type approval Authority e/E	**27**

Remarks:

1. <u>Base vehicle – different type vehicle</u>

Make: MAN
Type: L.2007.46.001
Category of vehicle: N3
Type approval: e4*2007/46*0229*??
Number of axle: 2

Make: MAN
Type: L.2007.46.003
Category of vehicle: N3
Type approval: e4*2007/46*0231*??
Number of axle: 3

2. <u>Base vehicle – different type vehicle (different manufacturers)</u>

Make: PEUGEOT
Type: Y
Category of vehicle: N1
Type approval: e3*2007/46*0045*??
Manufacturer:
Automobiles Peugeot, France

Make: CITROEN
Type: Y
Category of vehicle: N1
Type approval: e3*2007/46*0046*??
Manufacturer:
Automobiles Citroen, France

.

TAAM Minutes:

The meeting agreed with Solution 1B and Solution 2B.

At present there are some 2nd stage type approvals that are based at one 1st stage national type approval of the base vehicle issued before 2007/46/EC. This base vehicle national approval was transformed according to 2007/46/EC to more than one EC-type approval.

Currently the base vehicles are under the 2007/46/EC and types are different, so there should be separate 2nd stage type approvals for each type of the vehicle.

For 2nd stage manufacturer is better to have more simple approvals than one but complicated approval that will have to update after each extension of the base vehicle type approval.

5.11. Regulation (EC) 715/2007, Directive 2007/46/EC: Engine capacity

Romania 4

Subject: engine capacity
Legislation (directive / regulation / etc): regulation 715/2007/EU ; directive 2007/46/CE

Text:
R 715:
Article 2 Definitions
5. 'engine capacity' means either of the following:
(a) for reciprocating piston engines, the nominal engine swept volume;
(b) for rotary piston (Wankel) engines, **double** the nominal engine swept volume.

Background:
2007/46/CE
No definition for the engine capacity (the only reference concerns the number π and the rounding off the result of the calculus).

80/1268/CEE , 80/1269/CEE, 70/157/CEE or other relevant acts concerning the engine
No definition for the engine capacity

Question: what value of the rotary (Wankel) engine capacity must be written in the information folder made according to Annex I or Annex III of the frame-work directive and by consequence in the C.o.C.?

	Possibilities of solutions	accepted	refused
A	the value asked by R. 715/2007/UE	**x**	
B	the nominal engine swept volume		**x**

TAAM Minutes:

The meeting agreed with Solution A.

5.12. Regulation (EC) 715/2007, Regulation 692/2008: Access to vehicle OBD and vehicle repair and maintenance

Netherlands 2

Directive or Regulation number:
article 13 (7) regulation 692/2008
Subject:
access to vehicle OBD and vehicle repair and maintenance

Reference to Annex, etc in the Directive or Regulation:
article 13 (7)

Text:
7. The approval authority may presume that the manufacturer has put in place satisfactory arrangements and procedures with regard to access to vehicle OBD and vehicle repair and maintenance information, on the basis of a completed Certificate on Access to Vehicle OBD and Vehicle Repair and Maintenance. Information, providing that no complaint was made, and that the manufacturer provides this information within the period set out in paragraph 5.

Question:
The prescribed measures to be taken by the TAA are of a reactive nature. RDW has taken a more pro-active approach and will include an additional verification of the implementation of the arrangements and procedures with regard to access to vehicle OBD and vehicle repair and maintenance information during the regular COP assessment. In which way will your TAA regard this requirement?

Solutions:		
A	In addition, we will perform a verification of the implementation of the arrangements and procedures with regard to access to vehicle OBD and vehicle repair and maintenance information during the regular COP assessment.	
B	We will presume that the manufacturer has put in place satisfactory arrangements and procedures providing that no complaint was made, and that the manufacturer provides this information within the period set out in paragraph 5.	

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

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

Remarks:

TAAM Minutes:

It was explained that the numbers of complaints made mostly by independent operators (workshops) still increase. Delegations concurred that it is difficult and time-consuming for TAA to check that all requirements of Regulation 715/2007 concerning the access to vehicle OBD and vehicle repair and maintenance information were fulfilled by the manufacturers.

The UK delegation remarked that according to the text of the regulation TAA are not obliged to check the manufacturers in advance (be proactive), only after the complaints are made.

As there are no clear provisions how to deal with these requirements of the Regulation 715/2007, the delegates supported the opinion to discuss this topic in working groups ~~(GSR)~~ and set common standards or some mechanism for performing the check of mentioned requirements.

5.13. Directive 71/320/EC: Air reservoir axle

France 2

- **Regulation number :**

  - Directive 71/320/EC relating to the braking devices of certain categories of motor vehicles and their trailers
  - Directive 87/404/EC relating to simple pressure vessels
  - Directive 97/23/EC relating to pressure equipments (PED)
  - Framework Directive 2007/46/EC

Text of Directive 87/404/EC last amended 2009/105/EC

The vessel shall be made of either:
(i) a cylindrical part of circular cross-section closed by inwardly dished and/or flat ends which revolve around the same axis as the cylindrical part; or
(ii) two dished ends revolving around the same axis.

Text of Directive 97/23/EC

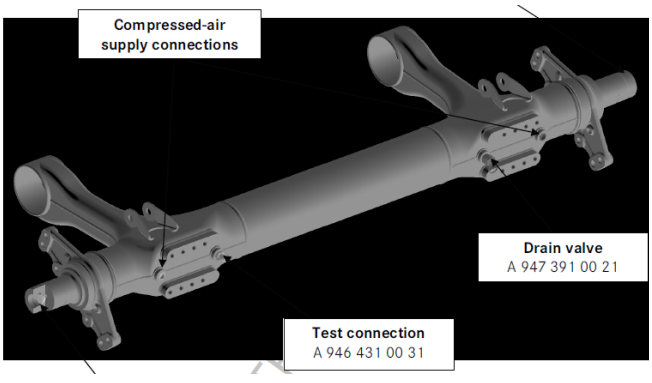
3. The following are excluded from the scope of this Directive:[…]
3.5. equipment intended for the functioning of vehicles defined by the following Directives and their Annexes:
— Council Directive 70/156/EEC of 6 February 1970 on the approximation of the laws of the Member States relating to the type-approval of motor vehicles and their trailers (1),

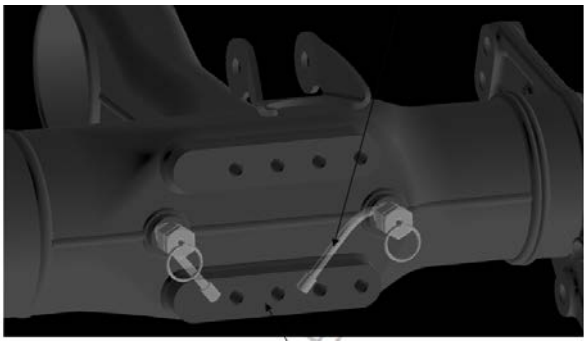
Text of Directive 2007/46/EC
Article 20 : Exemptions for new technologies or new concepts

1. Member States may, on application by the manufacturer, grant an EC type-approval in respect of a type of system, component or separate technical unit that incorporates technologies or concepts which are incompatible with one or more regulatory acts listed in Part I of Annex IV, subject to authorisation being granted by the Commission in accordance with the procedure referred to in Article 40(3).

- **Issue**

A manufacturer developed axles playing the role of air reservoir for breaking systems.
Nowadays, air reservoirs involved in breaking systems have to comply with the directive 87/404/EC (or the EN 286-2 norm). Unfortunately, these “axle” air reservoirs do neither belong to the scope of the 87/404/EC directive nor the 97/23/EC directive.





Question:

If this manufacturer would like a WVTA for his vehicles with such air reservoirs, does he need to apply for an article 20?

Type approving authority « e »	2

Possibilities of solution			Comments
	A	Yes, this kind of reservoir is a new technology, so article 20 is recommended	
	B	No, the compliance of the 87/404/EC directive is not mentioned in the directive 71/320/EC or ECE regulation 13. So the compliance with the 87/404/EC directive is not necessary for granting a WVTA	Only requirements of the directive 71/320/EC or ECE regulation 13 are mandatory.

TAAM Minutes:

The meeting agreed with Solution B, the WVTA is possible to grant without any additional requirements.

5.14. Regulation (EU) 19/2011: Statutory plates

Poland 1

Background:

From the 1st of February 2011 Commission Regulation (EU) No. 19/2011 entered into force and on the 1st of November 2014 will repeal Directive 76/114/EEC. It can be now applicable to new vehicle types in national/EC type-approval, also for new multi-stage vehicle types.

Question:

Is it necessary to issue a test report/type-approval certificate for additional statutory plate in case of multi-stage approval? If yes, then according to which requirements, as Commission Regulation (EU) No. 19/2011 doesn't mention anything concerning statutory plate for a multi-stage process. The only reference is in Directive 2007/46/EC Annex XVII p.4.2.

	Possibilities of solution	**Comments**
A	Yes, it's required to issue test report/type-approval certificate for multi-stage statutory plate according to requirements listed in ……. *please specify*	
B	No, drawing/photo with additional statutory plate in information document is sufficient	

TAA code: **„e"** **„E"**

TAAM Minutes:

The meeting agreed with Solution B.

5.15. ECE R48: Stop lamp

Netherlands 3

Directive or Regulation number:
-ECE-R48
Subject:
Stop lamp

Reference to Annex, etc. in the Directive or Regulation:
6. INDIVIDUAL SPECIFICATIONS 6.7. STOP LAMP **(**Regulation No.7)

Text:
6.7.1. Presence Devices of S3 or S4 category: mandatory on M1 and N1 categories of vehicles, except for chassis-cabs and those N1 category vehicles with open cargo space; optional on other categories of vehicles.

Question:
In case of a commercial vehicle category N1 for the purpose to tow a semi-trailer, is it necessary to have a stop lamp device according category S3?

Solutions:		
A	Yes, it is necessary to have a stop lamp device according category S3	
B	No, it is not necessary to have a stop lamp device according category S3	

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

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

Remarks:
Vision of e4 is to tread a commercial vehicle of category N1 for the purpose to tow a trailer as N1 category vehicles with open cargo space.

TAAM Minutes:

Majority of the delegates agreed with Solution B, but as the N1 category tractors are not very common, this issue should be considered case by case.

5.16. ECE R48, Directive 76/756/EC: Trailers used for road maintenance purposes

Czech Republic

Regulation No. 48 - Uniform provisions concerning the approval of vehicles with regard to the installation of lifting and light-signalling devices,
Directive 76/756/EEC relating to the installation of lighting a light-signalling devices on motor vehicles and their trailers.

Issue

Some trailers (mostly of O1 category) used for road maintenance purposes are equipped with the traffic signs, reflective materials in the form of hatching etc. (see the figures below).

In the case when the trailer is out of intended function and is normally transported on road, there is a problem with "moving traffic signs" or not approved reflective materials or their installation respectively. Pursuant to R 48 (paragraph 2.7.16.) "other retro-reflective plates and signals which must be used to comply with **national requirements** for use as regards certain categories of vehicles or certain methods of operation;" are not considered as retro-reflectors.

This definition is similar to the wording of Directive 79/756/EEC and of Directive 76/757/EEC relating to reflex reflectors for motor vehicles and their trailers (Annex 1, para 1.3.) as well. R 3 then takes over the definitions from R 48.

In the Czech Republic there are no specific or sufficient national requirements for approval of trailers fitted with such devices so far.

Question

How is this problem solved in other EU countries? Are there some national provisions referring to disabling of visibility of the devices relevant, by tilting, rotating, tape-applying, for example?

TAAM Minutes:

The most Member States do not have special national requirements for using of such traffic sings or reflective materials mounted on the trailers when the trailer is out of intended function and is transported on road.
In France, when the trailer is performing the intended function, the trailer is not considered as a vehicle, but as a special traffic device/system. During the transportation all signs and reflective materials have to be fully covered.
In United Kingdom the traffic sings are covered by the national regulation and does not matter if these traffic signs are mounted on the vehicle, but during the transportation these signs have to be covered up.
In Slovakia, if the system is not in use it is necessary to arrange all traffic sings and reflective materials in way that there will be no possibility of their exchange with traffic sings. There are no special national requirements concerning tilting, rotation or tape-applying.

5.17. ECE R7: Front and rear position lamps

Poland 2

Background:

Application of LED's in vehicles signaling lamps makes it possible to construct lamps meeting the requirements of UN Regulation No. 7, creating unseen, so far, lighting effects. Example of such construction is a rear position lamp made of electronic controlling device and ten non-replaceable LEDs, placed circularly, in which one LED is periodically turned out, creating effect of rotating gap in shining ring. Frequency of rotation is so selected that instead of visible changes of lens luminance, during measurements photometer did not reveal significant changes of luminous intensity (deviations are lower than measurement uncertainty). Based on photometer readings, luminous intensity changes can not be affirmed and according to UN Regulation No. 7 this lamp has steady luminous intensity. Formally such lamp meets the approval requirements of UN Regulation No. 7, concerning luminous intensity for light category R1 and it has been type-approved.

During approval of installation of light-signaling devices, according to UN Regulation No. 48, on vehicle equipped with this kind of lamps, questionable is interpretation of p. 5.9 of this Regulation, which says:

"5.9. In the absence of specific instructions, the photometric characteristics (e.g. intensity, colour, apparent surface, etc.) of a lamp shall not be intentionally varied during the period of activation of the lamp.
5.9.1. Direction-indicator lamps, the vehicle-hazard warning signal, amber side-marker lamps complying with paragraph 6.18.7. below, and the emergency stop signal shall be flashing lamps.
5.9.2. The photometric characteristics of any lamp may vary:
(a) in relation to the ambient light;
(b) as a consequence of the activation of other lamps, or
(c) when the lamps is being used to provide another lighting function, provided that any variation in the photometric characteristics is in compliance with the technical provisions for the lamp concerned."

Questions:

1. Can it be assumed, that the above mentioned lamp, meeting requirements of UN Regulation No. 7, did not meet requirements of p. 5.9 UN Regulation no. 48?
2. Poland would be most grateful to know whether this kind of lamp could be type-approved according to the UN Regulation No. 48 by the TAA of each EU Member State.

Question 1

Possibilities of solution		**Comments**
A - Yes		
B - **No**		

Question 2

Possibilities of solution		**Comments**
A - Yes		
B - **No**		

TAA code: **„e"** **„E"**

TAAM Minutes:

According to opinions of delegations, R 7 does not prohibit to grant an approval for such rear position lamps, if by the testing are not affirmed the luminous intensity changes. However, the lamps do not meet requirements of R 48 and approval according to R 48 can not be granted.

Though, the majority of delegation opined that even the approval according to R 7 should not be granted, if it is obvious that lamps will not fulfill requirements according to p. 5.9 of R 48. The Luxembourg delegation remarked that by any approval it is possible to argue with the safety reasons of the road traffic.

It could be concluded that there was general support in principle for Solution 1A and Solution 2B, but the Netherlands delegation offered to ask his expert in GRE to provide more information about the discussion in GRE on this specific topic.

Therefore the question remains on the next TAAM Agenda.

5.18. Directive 91/226/EC, Regulation (EU) 109/2011: Spray-Suppression Systems

Belgium

Spray-Suppression Systems

- Directive 91/226/EEC amended by 2010/19/EU (latest by 2011/415/EU)
- Commission Regulation (EU) No 109/2011

BACKGROUND

✧ Initially **N1 category was not in the scope** of Spray Suppression Directive 91/226/EEC (Part I of Annex IV of 2007/46/EC) – i.e. N2, N3 and O category only.

✧ When 2010/19/EU (amending 91/226/EEC) was issued, the scope was extended to all N categories, **including N1**.

In addition, this **extension of scope** was reflected **into Part I of Annex IV of 2007/46/EC**.

✧ When 2010/19/EU (amending 91/226/EEC) was issued, Spray suppression became mandatory from 9 April 2011 :

Article 3
2.With effect from 9 April 2011 Member States shall, on grounds related to spray suppression, refuse to grant an EC or national type-approval to a vehicle and a component not complying with the requirements laid down in Directive 91/226/EEC as amended by this Directive.

However, vehicles having a valid EC whole vehicle type-approval under 2007/46/EC need not to comply with 91/226/EEC :

Article 3
3. When applying for EC whole vehicle type-approval under Directive 2007/46/EC, vehicle types which were granted a national or EC type-approval covering spray-suppression, shall not have to comply with the spray-suppression requirements set out in Directive 91/226/EEC.

✧ As from 1 November 2014, GSR (Regulation (EU) 661/2009) will repeal 91/226/EEC. It will be replaced by Implementing measure Regulation (EU) 109/2011. The scope is limited to vehicles of **N and O categories**. The technical requirements are same as 2010/19/EU.

✧ GSR (Regulation (EU) 661/2009)

Article 6 *Specific requirements relating certain vehicles of categories **N and O***
…
5. *Vehicles of categories **N2, N3, O3 and O4** shall be constructed so as to minimize the effect of spray emissions from the vehicle on the ability of drivers of other vehicles to see*

✧ GSR (Regulation (EU) 661/2009)

Annex I - Scope of application of the requirements referred to in Article 5(1) and (2)

*Table : Spray – suppression systems are **not applicable for N1 vehicle** categories*

QUESTION

In case of existing vehicle types of category N1, which were introduced before 9th April 2011, is it still possible to have a valid 2007/46 EC type-approval without spray suppression system approval ?

We would like to know the opinion of the other TAAM participants

Possibilities of solution

Comments

	A	Yes, it still possible to have a valid 2007/46 EC type-approval without spray suppression system approval. Registration is possible after 1 Nov 2014.	
	B	No, it's NOT possible to have a valid 2007/46/EC type-approval without spray suppression system approval	

Type approving authority "e"	6

Selection of solution		accepted	refused
	A		
	B		

TAAM Minutes:

The meeting agreed with Solution A.

5.19. Directive 92/23/EC, Directive 2007/46/EC: Tyres & load capacity on M3 class II vehicles

France 1

- **Regulation number:**

  - Directive 92/23/EC relating to tyres for motor vehicles and their trailers and to their fitting.
  - Framework Directive 2007/46/EC

Text of Directive 92/23/EC, Annex IV

3.7.2. In the case of some special vehicles fitted with commercial vehicle tyres, the table 'Variation of Load Capacity with Speed' (see section 2.30 and Appendix 8 to Annex II) is not to be applied. In those cases the tyre maximum load ratings to check against the maximum axle loads (see sections 3.3.1.2 and 3.3.1.4 of this Annex) are determined by multiplying the load corresponding to the load capacity index by an appropriate coefficient which is related to the type of vehicle and its use rather than to the maximum design speed of the vehicle. In such cases section 3.4.1 of this Annex does not apply. The appropriate coefficients are as follows: […]

3.7.2.2. 1,15 in the case of such vehicles (M_3) if they are intended for use only on urban routes with frequent stops;

Text of ECE Regulation 107

2.1.1.2. "Class II": vehicles constructed principally for the carriage of seated passengers, and designed to allow the carriage of standing passengers in the gangway and/or in an area which does not exceed the space provided for two double seats.

Type approving authority « e »	2

- **Issue**

Question 1:

Since the definition of a class II vehicle does not clearly specify that this kind of vehicle "are intended for use only on urban routes with frequent stops", can we use the coefficient 1,15 to grant an approval to class II vehicles ?
For instance, can we accept a technically permissible maximum laden mass of **19 000 t** for a vehicle fitted with 275/70 R22.5 148/145J tires? (6300 + 11600 = **17900** x 1.15 = 20585)

Possibilities of solution			**Comments**
	A	Yes, there is an ambiguity. Definitions are not clear	Each country may have its own approach
	B	No, class II vehicles cannot use the coefficient 1,15 for the calculation of the TPMLM	EU Regulation 458/2011 clearly precises in Annex II, point 5.3.1 that only class I and A can be approved with this coefficient

Question 2:

If answer A, considering that each country may have its own approach, may a country refuse the registration of **TVVs** of class II vehicle for which **only tires** with this coefficient are included ?

	A	Yes	
	B	No	

TAAM Minutes:

The majority of delegations supported Solution 1B.
Because of the answer to Question 1 was B, Question 2 was no longer considered to be relevant.

5.20. Directive 2007/46/EC and 97/27/EC: Minimum payload of livestock trailers

Germany 5

Issue:
The bodywork of the trailer is made for the carriage of animals. The new Annex II is given an additional bodywork suffix to this group of trailers – supplement code 13 Livestock carrier;
The intended use of the trailer in question is to carry horses.
The payload of that trailer is in one version only 50kg. A horse does have a weight of approx. 400kg

Questions:
Is there a minimum payload for a trailer, if the intended use is the carriage of horses and also the bodywork supplement code 13 is given?

Prescription
Directive 2007/46/EC and 97/27/EC

Possibilities of solution			Comments
1	**A**	There are no provisions of a minimum payload, so an approval is possible; or one version of an approved type may only have e.g. 50kg payload.	It is obvious that the intended use of that trailer is not possible.
	B	The provisions of the framework directive allow to prohibit the approval or asking for a minimum payload.	No article is clearly stating this! If this is possible – what would be the minimum payload then??

Type approving authority "e"	1

Selection of solution		accepted	refused
	A		
	B		

TAAM Minutes:

Latvia remarked that a similar question was raised at TAAM in Riga, Agenda Item 5.6. and the result was that minimum load capacity is not required by the legislation.

The meeting agreed with Solution A.

5.21. Directive 97/27/EC: Determine the technically permissible maximum laden mass and category for trailers

Estonia

Directive number
Directives 2007/46/EC and 97/27/EC
Subject:
Determine the technically permissible maximum laden mass and category for trailers

Text of legal acts:

Annex I point 2.2.4 of directive 97/27/EC defines '*Centre-axle trailer'* as a rigid drawbar trailer where the axle(s) is (are) positioned close to the centre of gravity of the vehicle (when uniformly loaded) so that only a small static vertical load, not exceeding 10 % of that corresponding to the maximum mass of the trailer or a load of 1 000 daN (whichever is the lesser) is transmitted to the towing vehicle.

Point 2.6 of the same annex specify that the *'Technically permissible maximum laden mass'* means the maximum mass of the vehicle based on its construction and performance, stated by the manufacturer. Also there is mentioned that the vehicle category should be determined in accordance with Annex II to Directive 70/156/EEC (repealed by directive 2007/46/EC).

According to Annex I point 2.8 and 2.8.1 of directive 2007/46/EC vehicle manufacturer has do state technically permissible maximum laden mass $^{(i)}$.
Superscript (i) means that for trailers or semi-trailers which exert a significant vertical load on the coupling device, this load, divided by standard acceleration of gravity, is included in the maximum technically permissible laden mass.

- Annex II point 1.3.1 of directive 2007/46/EC specifies category O1 as a vehicles of category O having a maximum mass not exceeding 750 kg.
- Annex II point 2.2.3 sets out general provisions when determine maximum mass. It is said that in the case of a centre-axle trailer the maximum mass to be considered for classifying the vehicle shall correspond to the maximum mass transmitted to the ground by the wheels of an axle or group of axles when coupled to the towing vehicle.

Concern: When determine the category for centre-axle trailer, only the maximum mass transmitted to the ground by the wheels of an axle or group of axles when coupled to the towing vehicle should be taken into account. The technically permissible maximum laden mass stated by the manufacture does not influence the categorisation of centre-axle trailer.
Superscript (i) of Annex I point 2.8 of directive 2007/46/EC states that for trailers which exert a significant vertical load on the coupling device, this load is included in the maximum technically permissible mass.
In case where the maximum mass transmitted to the ground by the wheels of an axle or group of axles when coupled to the towing vehicle is 750 kg and the manufacture considers for O1 category vehicle a mass of a 75 kg as a significant vertical load on the coupling device (including this to technically permissible maximum laden mass), there will be situation where the technically permissible maximum laden mass of O1 category vehicle is 825 kg.
The same situation extents to O2 category vehicle which could have a technically permissible maximum laden mass up to 3850 kg.
As the vehicle with the technically permissible maximum laden mass of 825 kg will still be O1 category, it will not have to be equipped with brakes etc.

Questions

There is a possibility that the type-approval authority will not accept this kind of solution, but should a mass of a 75 kg be considered as a significant vertical load on the coupling device and should be included to the technically permissible maximum laden mass for category O1 vehicle?

Solution			Accepted	Refused
A	Yes	There are two kind of masses 1. The technically permissible maximum laden mass is stated by the manufacturer, which includes the vertical load on the coupling device. 2. The maximum mass transmitted to the ground by the wheels of centre-axle trailer, which categorizes the trailer.		X
B	No	According to Annex I point 2.2.4 of directive 97/27/EC static vertical load not exceeding 10 % of that corresponding to the maximum mass of the trailer will be considered as small, not significant load. According to Annex II point 1.3.1 of directive 2007/46/EC the maximum mass of the trailer of category O1 could not exceed 750 kg.	X	

Type approval authority "e"	**29**

Note: European Commission proposal for a Commission Regulation on masses and dimensions (implementing measure of Regulation (EC) No 661/2009 on General Safety) article 2 point 7 defines: *'technically permissible maximum laden mass'* as the maximum mass allocated to a vehicle on the basis of its construction features and its design performances; the technically permissible laden mass of a trailer or of a semi-trailer includes the static mass transferred to the towing vehicle when coupled;
The proposal does not include wording "significant vertical load", which makes the situation complicating. This could lead to confusing situation for police, technical periodical inspection and others because the technically permissible maximum laden mass of O1 category vehicle could be up to 825 kg. Usually, O category vehicle with technically permissible maximum laden mass over 750 kg, is considered as O2 category.
http://ec.europa.eu/enterprise/sectors/automotive/files/proposal-masses-and-dimensions_en.pdf

TAAM Minutes:

There was not achieved the results from the discussion because several delegations were in favour of Solution A and another delegations in Solution B.

It is a borderline case, but counting with the static vertical load on the coupling device, such trailer should not be approved as the vehicle of O1 category.

This item need to be newly discussed and the discussions of the masses and Dimensions group have to be taken into account.

5.22. ECE R 118: Use of ISO or other Industrial standards

Germany 3

Issue:
UN Regulations are more and more using ISO Standards or other Industrial Standards instead of explicit test procedures/provisions. One example is UN R 118.

In the Original version of Reg 118 under 6.2.4 and 6.2.4.4 electric cables were exempted from testing. With 01 series this was amended by:
"6.2.5. Electric cables shall undergo the resistance to flame propagation test described in ISO standard 6722:2006, paragraph 12.
The result of the test shall be considered satisfactory if, taking into account the worst test result, any combustion flame of insulating material shall extinguish within 70 seconds and a minimum of 50 mm insulation at the top of the test sample shall remain unburned."

Questions:

1. Is a type-approval for the electric cables necessary or is the fulfilment of ISO 6722:2006, paragraph 12 enough? And…
2. If the fulfilment is enough, is a manufacturer's declaration of the ISO sufficient or needs a notified Technical Service to declare this in the Test Report?

Prescription
UN Regulation no. 118; 01 Series of Amendment

Possibilities of solution — Comments

1	**A**	A type-approval for electric cables is necessary. The TS needs to do the testing.	That will end in thousands of tests!
	B	Fulfilment of the ISO Standard is sufficient.	
2	**A1**	The TS needs to state the ISO fulfilment in the report.	This TS need to be notified by the resp. TAA.
	A2	The TS states the ISO fulfilment and is allowed to use reports from a non notified laboratory	
	B	A vehicle manufacturer declaration of ISO fulfilment is sufficient.	

Type approving authority "e"	1

Selection of solution		accepted	refused
	1A		x
	1B	x	
	2A1		x
	2A2	x	
	2B		x

TAAM Minutes:

The meeting agreed with Solution 1B and Solution 2A2.

The Technical Service has to have the accreditation according to EN ISO 17025 for performing the testing according to ISO 6722:2006.

5.23. Directive 2007/46/EC, ECE R107, Directive 2001/85/ES, Regulation (EC) 661/2009, Regulation (EU) 678/2011: Bus and coach definition

Romania 2

Subject: bus and coach definition
Legislation (directive / regulation / etc): 2007/46/EC; regulation 678/2011/EU; regulation 661/2009/EU; regulation ECE-UN no. 107 rev. 03 (R107); directive 2001/85/EC

Texts:

- 2007/46/CE Annex IX C.o.C. model for M3:

42. Number of seating positions (including the driver) (k):
k: …For **coaches** belonging to the vehicle category M3 the number of crew members shall be included in the passenger number

- R 661/2009/EU: Article 12…

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 2 and M 3 , except for those with more than three axles, articulated buses and coaches, and **buses** of Class I or Class A;

- 2001/85/EC: "**Bus or coach**" means a vehicle defined in paragraph 2 of Annex I to Directive 2001/85/EC;

Observation: all these regulatory acts refer at several points / articles to the terms **"bus"** and **"coach"** (including in the title of the directive 2001/85/EC as is written in Annex IV of the frame-work directive) but the definition of terms can be find nowhere. There are some questions based on the texts of the regulatory acts to be asked:

Questions:
1. What is the difference between bus and coach?
2. How are linked the terms "bus" and "coach" to the classes as defined by the directives?

The answer is obvious: based on the next of regulatory acts it is impossible to answer these questions.

This lack of definitions opens the door for different interpretations by the Type Approval Authorities which may cause problems for the producers / applicants for the type.

	Possibilities of solutions	accepted	refused
A	deleting all the references to terms "bus" and "coach" in all the regulatory acts and replacing them by "vehicles of categories M2 and M3"		
B	other		

Proposal: if TAAM delegations reach a common point of view we suggest sending this problem to next TAAEG or directly to TCMV in order to be solved as quickly as possible.

TAAM Minutes:

It was explained by the German delegation that in German versions of the directives, EU regulations and ECE-UN regulations there is only term "bus". Also UK delegation clarified that terms "bus" and "coach" are interchangeable, are synonym.
The Netherland delegation remarked that they understand the bus of class III under the term "coach".

The meeting agreed that there is no changes needed to make in legislation acts.

5.24. Directive 2007/46/EC, ECE R107: Access to emergency exits

United Kingdom 2

2001/85EEC & ECE R107:

Bus and Coach – Access to emergency exits

LEGISLATION

Emergency Exits

7.6.7.1. Emergency doors shall be capable of being easily opened from inside and from outside when the vehicle is stationary. However, this requirement shall not be construed as precluding the possibility of locking the door from the outside, provided that the door can always be opened from the inside by the use of the normal opening mechanism

Background

The requirement for emergency doors to be *easily opened* from inside and out is very subjective.

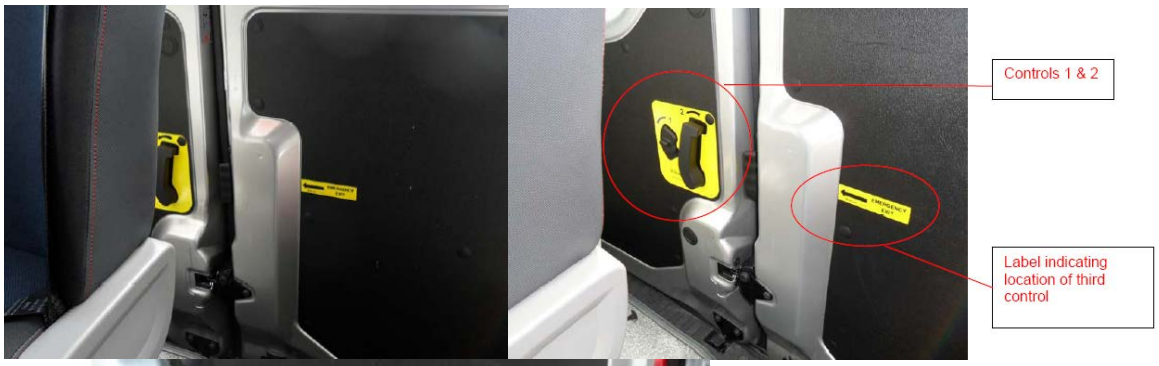
Discussion

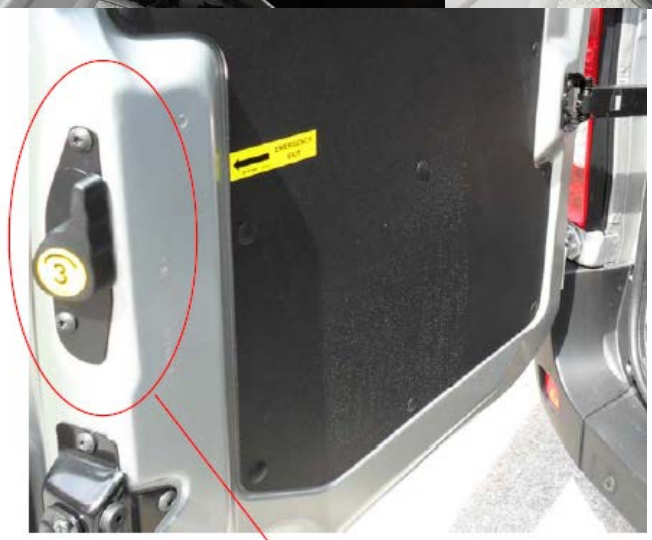
In the UK we have become aware of M2 minibuses where the emergency door exit controls are partially obscured by the rearmost row of seats. We believe that this may occur because the doors are designed to be compatible with right hand traffic (left hand drive) layouts, where a single seat is on the right of the vehicle and a twin seat on the left of the vehicle, thus enabling easy access to the emergency door releases on the right of the vehicle. However, when in left hand traffic (right hand drive) layouts the seats are reversed but the doors are not, resulting in the double seat obscuring the emergency door (see photos below

Question:

When considering emergency exits for 2001/85EEC & ECE R107. Should access to the emergency exits be considered for both interior layouts (left and right hand drive) if both are to be approved?

Option	Possible Solution	Comments
A	Yes, emergency exits should be considered for both interior layouts (left and right hand drive vehicles) and the results recorded.	
B	No, only one layout need be considered	
C	Other	





TAAM Minutes:

Delegates were in favour of the Solution A.

5.25. Directive 2007/46/EC, ECE R107, Regulation (EC) 661/2009: Number of crew members

Romania 1

Subject: number of crew members
Legislation (directive / regulation / etc): 2007/46/EC ; 661/2009/EU; regulation ECE-UN no. 107 rev. 03 (R107)

Texts:
R 107:
Definitions
2.14.1. "*Floor*" means that part of the bodywork whose upper surface supports standing passengers, the feet of seated passengers and the driver and **any crew member**, and may support the seat mountings;
2.18. "*Mass of the vehicle in running order*" means the mass of the unladen vehicle with bodywork, and with coupling device in the case of a towing vehicle, in running order, or the mass of the chassis with cab if the manufacturer does not fit the bodywork and/or coupling device (including coolant, oils, 90 per cent fuel, 100 per cent other liquids except used waters, tools, spare wheel and driver (75 kg), and, for buses and coaches, **the mass of the crew member** (75 kg) if there is **a crew seat** in the vehicle.
2.23. "*Member of the crew*" means a person assigned to operate as a co-driver or the possible assistant.

Annex 1 ECE Type-Approval documentation, Part 1 Model Information documents, Appendix 1 Model information document pursuant to Regulation No. 107 relating to Type-Approval of category M2 or M3 vehicles with regard to their general construction
3.4. Mass of the vehicle with bodywork, and in the case of a towing vehicle of a category other than M1, with coupling device, if fitted by the manufacturer, in running order, or the mass of the chassis or chassis with cab, without bodywork and/or coupling device if the manufacturer does not fit the bodywork and/or coupling device (including liquids, tools, spare wheel and driver, and, for buses and coaches, **a crew member if there is a crew seat in the vehicle**) (o) (maximum and minimum for each variant).
(o) The mass of the driver and, if applicable, of **the crew member** is assessed at 75 kg (subdivided into 68 kg occupant mass and 7 kg luggage mass according to ISO Standard 2416 - 1992), the fuel tank is filled to 90 per cent and the other liquid containing systems (except those for used water) to 100 per cent of the capacity specified by the manufacturer.
5.5. **Crew seat**: yes/no[1]

Annex 1 ECE Type-Approval documentation, Part 1 Model Information documents, Appendix 3
3.3. Mass of the vehicle with bodywork and, in the case of a towing vehicle of a category other than M1, with coupling device, if fitted by the manufacturer, in running order, or the mass of the chassis or chassis with cab, without bodywork and/or coupling device if the manufacturer does not fit the bodywork and/or coupling device (including liquids, tools, spare wheel and driver, and, for buses and coaches, **a crew member if there is a crew seat** in the vehicle): (o) (maximum and minimum for each variant)

Annex 3 Requirements to be met by all vehicles
7.4.2.1 ...
If a single deck vehicle is intended for standees or with **a crew member who is not seated**, the centre of gravity of the loads Q or 75 kg representing them, shall be uniformly distributed over the standee or crew area respectively, at a height of 875 mm. If a double deck vehicle is intended to be used with **a crew member who is not seated**, the centre of gravity of the mass of 75 kg representing the crew member shall be placed in the upper deck gangway at a height of 875 mm....
7.6.1.7.2. **One or two seats are permitted alongside the driver for additional people,** in which case both of the exits referred to in paragraph 7.6.1.7.1. shall be doors
7.7.1.8 However, **one or more folding seat(s) for use by the crew** may obstruct the access passage to a

service door when in the position of use provided that

7.7.1.8.1. It is clearly indicated, both in the vehicle itself and on the communication form (see Annex 1), that **the seat is for the use of crew** only.

2007/46/CE

Annex I and Annex III

2.6. **Mass in running order** Mass of the vehicle with bodywork and, in the case of a towing vehicle of category other than M 1 , with coupling device, if fitted by the manufacturer, in running order, or mass of the chassis or chassis with cab, without bodywork and/or coupling device if the manufacturer does not fit the bodywork and/or coupling device (including liquids, tools, spare wheel, if fitted, and driver and, for buses and coaches, **a crew member if there is a crew seat** in the vehicle) (h) (maximum and minimum for each variant):

Question 1: taking into account all the above mentioned texts it is possible to established with certitude how many crew members are allowed for M2 and M3 category?

	Possibilities of solutions	accepted	refused
A	one		
B	two		
C	at the manufacturer will		

Question 2: who are the additional people (see point 7.6.1.7.2)?

	Possibilities of solutions	accepted	refused
A	only crew member(s)		
B	only passenger(s)		
C	crew member(s) and passenger(s)		

TAAM Minutes:

Majority of the delegations supported Solution 1C and Solution 2C.

The seats installed alongside the driver have to meet technical requirements according to R 107.

5.26. Directive 2007/46/EC, ECE R107: Exits

United Kingdom 3

2001/85EEC & ECE R107:

Bus and Coach – Exits

LEGISLATION

SCOPE 2001/85/EC

1.1. This Directive applies to every single deck, double deck, rigid or articulated vehicle of category M_2 or M_3 as defined in Annex II, Part A, of Council Directive 70/156/EEC

7.6.10. Technical requirements for retractable steps (identical wording ECE R107.04)

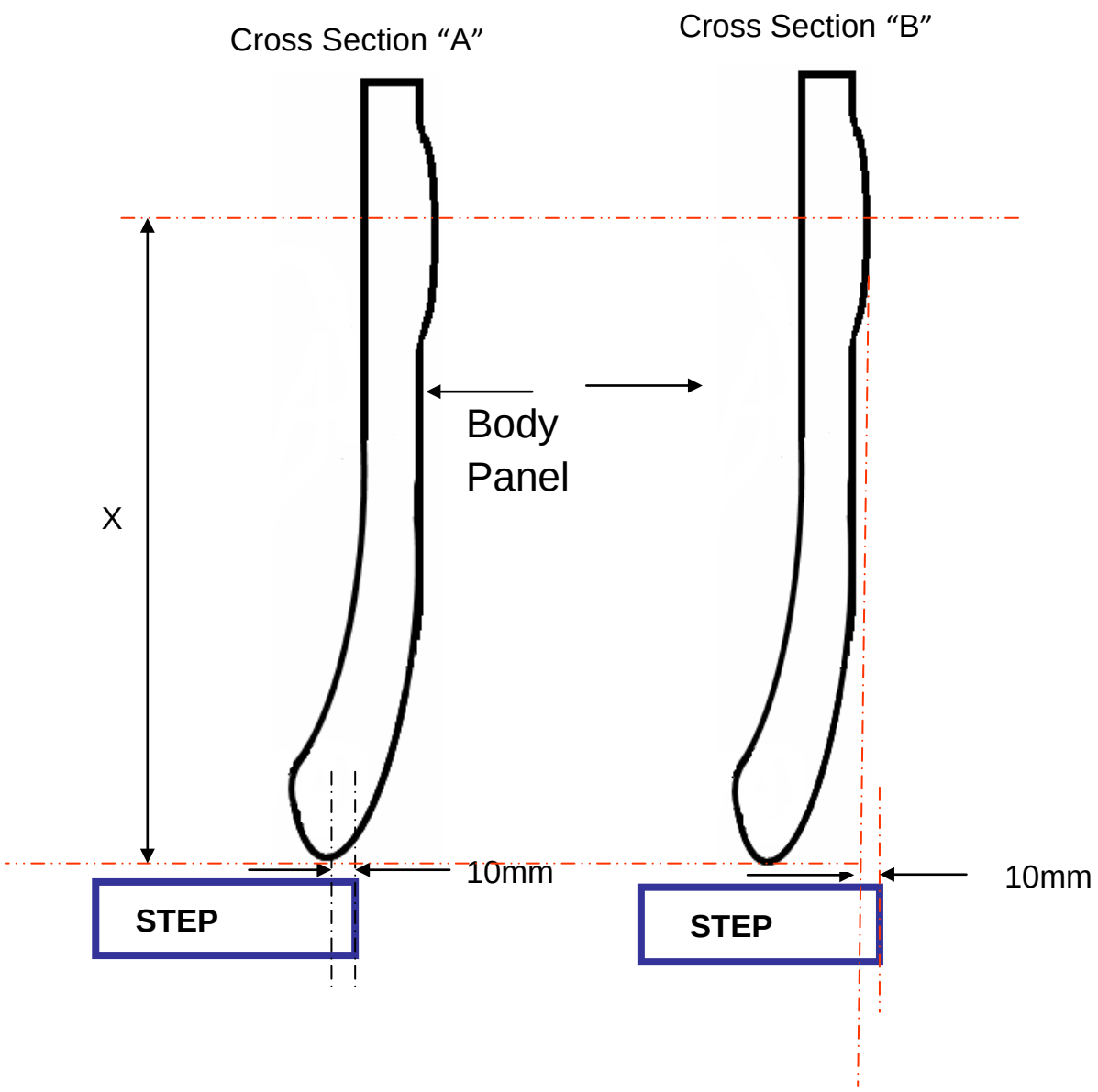
Retractable steps if fitted shall comply with the following requirements:

7.6.10.2.
when the door is closed no part of the retractable step shall project more than 10 mm beyond the adjacent line of the bodywork;

Discussion

Buses have traditionally been vehicles with flat sides making the interpretation of the adjacent body work fairly simple however we are now seeing more, contoured body shapes, which makes that interpretation more difficult. We would like the TAAM members views on the interpretation of “adjacent” in this case.

Question:
Looking at the two cross sectional options below which of the two examples complies with the requirements of the legislation; “when the door is closed no part of the retractable step shall project more than 10 mm beyond the adjacent line of the bodywork”?



X = Widest part of body

Option	Possible Solution	Comments
A	Cross Section “A” acceptable	
B	Cross Section “B” acceptable	
C	Other	

TAAM Minutes:

Majority of the delegations supported Solution A. However, for some delegations also the Solution B was acceptable because of the shape of the body such retractable step is not dangerous for pedestrians staying next to the bus.

The French delegation suggested to progress this item to GRSG. The UK delegation prepares proposals for GRSG discussions and will report at the next TAAM.

5.27. Directive 2007/46/EC, ECE R107: Visual Entertainment

United Kingdom 4

2001/85EEC & ECE R107:

Bus and Coach – Visual Entertainment

LEGISLATION

ANNEX 1 - 7.15. VISUAL ENTERTAINMENT

Forms of visual entertainment for passengers, for example television monitors or videos, shall be located out of the driver's view when the driver is seated in his normal driving position. This shall not preclude any television monitor or similar device used as part of the driver's control or guidance of the vehicle, for example to monitor service doors.

Discussion

There is currently no definition for the "drivers view" for M2/M3 vehicles, therefore in order to meet the requirements of 2001/85/EEC and ECE R107; VCA have interpreted this to mean that entertainment screens should be located rearwards of the drivers "H" point, though a screen could be considered to be "*out of the driver's view"* if a physical shield or some other countermeasure were provided which prevents the driver viewing the image on screen.

The VCA interpretation is:

A visual entertainment screen may be placed forward of the driver's H-point only if it can be demonstrated that the moving image is not visible to the driver in all normal seating positions. This may be achieved by virtue of:

a) a physical shield robustly built into the vehicle, or;

b) suitable masking built in to the screen, or;

c) an appropriate countermeasure fitted to the screen itself (e.g. laptop privacy shielding film)

Any countermeasure should not be easily removable without the use of tools.

However, we have seen a number of examples where we think that the entertainment is easily seen by the driver with the potential to cause distraction:

Question

Is it acceptable to have a visual entertainment system forward of the drivers "H" point such that it can be seen by the driver even if movement of the head is required?

Option	Possible Solution	Comments
A	Yes	
B	No - A visual entertainment screen may be placed forward of the driver's H-point only if it can be demonstrated that the moving image is not visible to the driver in all normal seating positions. This may be achieved by virtue of; a) a physical shield robustly built into the vehicle, or; b) suitable masking built in to the screen, or; c) an appropriate countermeasure fitted to the screen itself (e.g. laptop privacy shielding film) Any countermeasure should not be easily removable without the use of tools.	
C	Other	

TAAM Minutes:

The meeting supported Solution B.

5.28. Directive 2007/46/EC, ECE R107: Requirements for technical devices facilitating access for passengers with reduced mobility

United Kingdom 5

2001/85EEC & ECE R107:

Bus and Coach – Requirements for technical devices facilitating access for passengers with reduced mobility

LEGISLATION

2001/85/EEC (Similar words in ECE107 Annex 8 – 3.11.4.3.2)
Annex VIII

3.11.4.3. Additional technical requirements for power-operated ramps.
3.11.4.3.1. Extension and retraction of the ramp shall be indicated by flashing yellow lights and an audible signal; the ramps shall be identifiable by clearly visible red and white retro-reflecting hazard markings on the outer edges.

76/756/EEC
Annex II

3. Without prejudice to the requirements of Article 8(2)(a) and (c) and (3) of Directive 70/156/EEC, of this Annex and to any requirements in any of the separate directives, the installation of any other lighting or light-signalling device than those defined in paragraph 2.7 of UN/ECE Regulation No 48 is prohibited

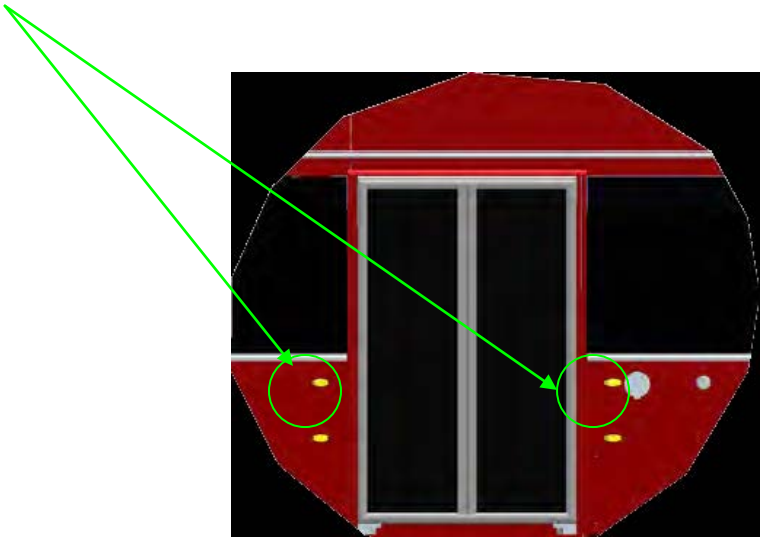
Discussion

In the United Kingdom in the past, vehicles were certified as Public Service Vehicles by virtue of having been constructed in accordance with either 2001/85/EC or UNECE Reg 107, and were permitted entry into service, even though they did not comply with the United Kingdom Road Vehicle Lighting Regulations.

However, for EU whole vehicle type approval an M3 category vehicle must demonstrate compliance simultaneously with the full range of technical requirements, including those contained in both UNECE Reg 107 and 48. This is made difficult as the current provisions of UNECE Reg 107, para 3.11.4.3.1 for flashing yellow lights to signal movement of a power operated boarding ramp may be deemed to contravene the requirements of Reg 48 (or more specifically 76/756/EEC which prevents the installation of non-specified lighting).

Ramp Warning Lights

Ramp Warning Lights



Question

Until such time as the commission modifies the requirements of UNECE Reg 48 to exempt these lights we would like to ask the TAAM members how to deal with situation.

Option	Possible Solution	Comments
A	"Lamp" means a device designed to illuminate the road or to emit a light signal to other road users. These lights can be considered to not be “lamps and so be ignored.	
B	Other	

TAAM Minutes:

It was clarified that ramp warning lights in this case do not have to be defined as it is stated in option A, because then any additional lamps or light sources could be permitted to use on the outside of the vehicle.

In this particular case the technical requirements of R 107 overwrite the provisions of R 48. Such bus can be approved with this ramp warning lights because they are required by R 107.

Such cases need to be resulted in GRE and R 48 should be amended with adding the exemptions for R 107.

5.29. Directive 2007/46/EC, ECE R107, Directive 2001/85/ES: Passengers trailers

Romania 3

Subject: passengers trailers

Legislation (directive / regulation / etc): 2007/46/EC; regulation ECE-UN no. 107 rev. 03 (R107); directive 2001/85/EC

Texts:

- 2007/46/CE Annex XIX Timetable for the enforcement of this directive in respect of type-approval

…

Categories concerned	Enforcement dates		
	New types of vehicles optional	New types of vehicles obligatory	Existing types of vehicles obligatory
…	…	…	…
Incomplete and complete vehicles of categories N2 , N3, O 1 , O 2 , O 3 , O 4	29 April 2009	29 October 2010	29 October 2012
…	…	…	…
Completed vehicles of categories O 1 , O 2 , O 3 , O 4	29 April 2009	29 October 2011	29 October 2013

- R107 : 1. Scope

1.1. This Regulation applies to every single-deck, double-deck, rigid or articulated vehicle of category **M2 or M3**

- 2001/85/CE: 1. Scope

1.1. This Directive applies to every single deck, double deck, rigid or articulated vehicle of category **M2 or M3**

Question:

What regulatory act must be applied concerning a request for type approval of O3 or O4 category vehicle designed to transport passengers (from the point of view of the provisions concerning the carriage of passengers)?

Possibilities of solutions	accepted	refused
2001/85/CE		
Reg. ECE-UN 107		
national provisions		
other(s)		
it is prohibited to approve such a vehicle		

TAAM Minutes:

There are no possibilities to grant WVTA for vehicles of O3 and O4 category designed for transport passengers. Only national provisions can be applied.

6. ITEMS RELATING TO FRAMEWORK DIRECTIVE 2002/24/EC (MOTORCYCLES)

6.1. Directive 2002/24/EC: Certificate of Conformity

Lithuania 1

Issue
Directive 2002/24/EC and 2007/46/EC prescribes requirements for type-approval and Certificate of Conformity (CoC). Some manufacturers have more than one trade name and put this information in CoC.

Legislation:
Directive 2002/24/EC

Certificate of Conformity
0.1. Make: (trade name of manufacturer)

Regulation 2007/46/EC as amended by Regulation (EC) No. 385/2009

Certificate of Conformity
0.1. Make (Trade name of manufacturer):

Question: Which trade name of manufacturer must be used for vehicle registration?

Possibilities of solution		Comments
A	First one	
B	All	
C	One value must be used in CoC	

Type approving authority "e"	**36**

Selection of solution		accepted	refused
	A	X	
	B		X
	C	X	

Other opinion / comment:
Examples:

0.1. **Marque(s) (raison sociale du constructeur):**
Make(s) (trade name of manufacturer): HI-BIRD, KOAYENG

0.1. Make : HSUN, CROWN, YAMOTO, TOMOTO, DORTON, JIALING, YELLOWROCK, OMI, DORADO, KARYA, SUPERKING, SAHSUVAROGLU, GORILLA, TEXAS, BISAN, SKIDA, BEMIGERMANY, Presto, CQ, SCORPION, AMP, GOSPEED, FBV, KMS, PANTERA, MONERO, DRAGON, VENSTAR, XRIDER, CELIK, AKIDA, ERSI, CATWALK, TAKASIII, Tiger, CCM, FOX, RedCAT, ROKETA, KOLPIN, SSR, Zebra, VENTO, BAMX, YUMA, RAIDER, WANGAN, WGUAN, LISOHAKA, YAMKING, KCROWN, HUMMER, ARMODE, CHONGQING , BRIDGE, DEER

TAAM Minutes:

The delegates concurred that only one make (trade name of manufacturer) should be stated in the COC. However, in practice, there are many COCs in the market where many makes are stated and also there is no legal provision that such COC can be or has to be refused.

Many makes stated in COC are problematic especially by the registration of the vehicle, because Member States use only one make which is also marked in the registration documents.

6.2. Use of Directive 77/541/EEC under Regulation (EU) 661/2009 (GSR) for L category vehicles

Germany 4

Issue:
Since all future measures how to handle the GSR are made for the 'normal-4 wheelers', provisions for M, N and O categories used by the L category framework directive lead to problems after 1.11.2014!
The Multi-directive 97/24/EC (Chapter 11) covers also provisions for seatbelts for light 4-wheel vehicles. The provisions are using an annex of the directive 77/541/EEC **(M, N, O).**
M, N and O vehicles are in the scope of the GSR, not L vehicles. Article 19 of Reg (EC) 661/2009 repeals several legal acts from 1.11.2014 onwards.

What happens with references to repealed directives of other categories?

Questions:
How do TAA issue approvals after the 1.11.2014 if the new framework directive is not yet in force and take care of the provisions for seat belts?

Prescription
Directive 2002/24/EC and multi-directive 97/24/EC under the view of GSR 661/2009 provisions.

Possibilities of solution			Comments
1	**A**	An approval for seatbelts under 97/24/EC using the reference to the annexes of 77/541/EEC is possible still after 1.11.2014	Although the directive will be repealed the annexes are still usable for approvals of other directives (here 97/24/EC), other categories.
	B	An approval under UN R16 for L category vehicles to be used in a WVTA under 2002/24/EC is possible.	A direct link to R 16 is not given until now, but L category veh. are in the scope of UN R16.

Type approving authority "e"	1

Selection of solution		accepted	refused
	A	x	
	B	x	

TAAM Minutes:

At first, the meeting supported both solutions, Solution A and Solution B. However, the meeting concluded that the best solution is Solution B, because according to Art. 19 of GSR 661/2009 references to the repealed Directives shall be construed as references to this Regulation, so there is a direct reference to R 16.

6.3. Directive 2002/24/EC: Trailers for motorcycle – EC Type approval or individual approval

Lithuania 2

Issue
Directives 2002/24/EC and 2007/46/EC prescribes requirements for EC type-approval and 2007/46/EC – for individual approval.
Approval for trailers, see examples.

Legislation:
Directive 2002/24/EC applies only to two or three-wheel motor vehicles.

Question: Are these trailers an object for type approval or individual approval?

Possibilities of solution		Comments
A	Yes	Yes, these trailers could be approved regarding 2007/46/EC
B	No	There are not approval requirements for these trailers
C	Other	National authority can apply national type approval procedures

Type approving authority "e"	**36**

Selection of solution		accepted	refused
	A		X
	B	X	
	C	X	

Other opinion / comment:
National requirements must be applied for these trailers, because there are not requirements in EU legislation for that kind of coupling device. Requirements for Installation of lighting and light signaling devices could not be fulfilled because of size.

Examples:

TAAM Minutes:

Discussion results in conclusion that none particular answer from provided solution should be chosen. The meeting agreed that there are no harmonized technical requirements for such trailers under Directive 2007/46/EC and Directive 2002/24/EC and the EC-type approval can not be granted.

National TAA can apply national requirements and national type approvals.

6.4. ECE R22: Helmets with movable protective lower face covers

Germany 6

Issue:
The helmet which picture is attached has got a movable lower face cover. This cover is also possible to be fixed in the upper position. The KBA has until now the view that in the open position the helmet creates general safety risks and it not approvable!

Questions:
We would like to get the opinion of the other TAA if they would grant an approval of such a helmet under the categories P/J?

5.1.4.1.2.1. a dash and symbol:
"J" if the helmet does not have a lower face cover
"P" if the helmet has a protective lower face cover, or
"NP" if the helmet has a non-protective lower face cover


Prescription
UN Regulation R22

Possibilities of solution			Comments
1	**A**	An approval is possible	
	B	The construction of the helmet does not allow an approval explicitly the open upper position of the lower face cover creates serious risks.	

Type approving authority "e"	1

Selection of solution		accepted	refused
	A		x
	B	x	

TAAM Minutes:

In discussion were heard different opinions. In generally, R 22 does not prohibit to approve these helmets under "P/J". The delegates agreed that such helmet has to fulfill all technical requirements according R 22 for position with protective lower face cover "P" and for position without a lower face cover "J" (face cover locked in upper position).

The manufacturer has to state which helmet position is intended for using during the drive and it has to be indicated in the user manual/user guide for helmet.

It is also necessary to take into account that there are differences between technical requirements for approving these helmets and national requirements for using these helmets in the road traffic in each Member State.

7. ITEMS RELATING TO FRAMEWORK DIRECTIVE 2003/37/EC (AGRICULTURAL AND FORESTRY TRACTORS)

7.1. Directive 2000/25/EC: Flexibility scheme for the tractors

Romania 6

Subject: Flexibility scheme for the tractors
Legislation (directive / regulation / etc): 2000/25/EC, Annex IV Flexibility scheme

Text:
ANNEX IV
Provisions for tractors and engines placed on the market under the flexibility scheme laid down in article 3a
1. Actions by the tractor manufacturers
1.1. Except during Stage III B, a tractor manufacturer who wishes to make use of the flexibility scheme shall request permission from the approval authority to place tractors on the market in accordance with the relevant provisions set out in this Annex. The number of tractors shall not exceed the ceilings set out in sections 1.1.1 and 1.1.2. The engines shall meet the requirements referred to in Article 3a.

Background:
According to point 1.1. the manufacturer shall request from the approval authority to place tractors on the market. The text doesn't mention to which approval authority shall make the request respectively the approval authority who granted the approval of the tractor or the approval authority of the country in which the tractor manufacturer will place the tractors.

Question:
To whom will make the manufacturer the request to place tractors on the market under flexibility scheme?

Possibilities of solutions	Accepted	Refused
A. the approval authority who granted the approval of the tractor	**X**	
B. the approval authority of the country in which the tractor manufacturer will place the tractors		**X**
C. anyone of the approval authorities mention above		**X**

TAAM Minutes:

The meeting supported Solution A.

8. MISCELLANEOUS

8.1. Short report of the ETAES-Meeting

Germany

ETAES Meeting was held on Wednesday 25 April 2012 (13:00 – 17:00).

TAAM Minutes:

Mr. Frank Wrobel (Chair of the ETAES group) outlined key points from the ETAES meeting.

At the beginning he expressed his pleasure about the number of the participants that for the first time in ETAES history exceed 30.

Ms. Andrea Förster (GER) presented 3rd edition of the ETAES and new Manual to this edition. The key innovation is that this version will run at common "html" browsers, therefore will be more reachable and more secure. The transition from ETAES II to ETAES III is planned in August 2012. For now the trial version of ETAES III is available for all Member States via different/special usernames and passwords. All users were asked to send any ideas/comments to administrator in order the errors could be eliminate before initiating of the system in summer.

At present, the ETAES is using by all Member States (including Italy) and EEA countries and the new user is Croatia.

Mr. Wummel presented the work of the EReg/CoC database working group concerning the creation of Coc data "masterfile".

As Mr. Derek Jones retired and no longer will attend the ETAES, new secretary is needed to help with finalizing the ETAES Meeting reports. Any volunteer among the participants will be welcomed by Mr. Wrobel.

Full details will be available through the ETAES meeting report which will be circulated separately.

8.2. Directive 71/320/EC: Type-approval of replacement brake lining assemblies as separate technical units

Germany 7

Issue:
The compliance of brake lining assemblies to the requirements of UN R 90 as well as 71/320/EEC shall be demonstrated by tests on the relevant vehicle. In some cases it is hard to find a sufficient vehicle especially in cases of classic cars. A manufacturer of replacement brake lining assemblies asked for an alternative test using a special test bench. KBA considers to transfer the relevant procedures and requirements to the test on the test bench and to grant an EC approval.

Question:
We would like to get the opinion of the other TAA if they would grant and/or accept type-approvals based on this adapted test conditions?

Legislation
71/320/EEC, Annex XV

Possibilities of solution			Comments
1	**A**	An type-approval can be granted/accepted.	
	B	Deviating test conditions do not allow an approval.	

Type approving authority "e"	1

Selection of solution		accepted	refused
	A	x	
	B		x

TAAM Minutes:

The meeting agreed with Solution B, the type approval can not be granted/accepted, only national requirements should be applied.

8.3. Supervising of testing

Poland

Issue:
The Poland delegation raised an informal question concerning supervising/witness testing.

Notified Technical Service with ISO Standard 17025 accreditation goes to another laboratory, especially to laboratory owned by the manufacturer to perform as it called “supervised” or witness testing”. The representative of the accredited laboratory will check the testing equipment for its legality, technical competence of the technical staff and then will also witness that the tests are carried out by the staff in proper way and finally authorize the results of the tests.

Question:
How is the practice with such testing in other Member States? Would it be possible for notified Technical Service to perform such supervising/witness testing?

TAAM Minutes:

Resulting from discussion, in common practice, notified Technical Services perform supervise/witness testing in other testing laboratories, mostly in laboratories of the manufacturers. Notified Technical Service has to be accredited according to ISO Standard 17020 (category B). By performing such testing it is necessary to be careful with systematic errors that might appear during the testing in non-accredited testing laboratories.

9. FUTURE MEETINGS

Slovakia

9.1. Meeting Organization in Slovakia

Opinions and remarks on the meeting organization in Slovakia and advices for next meetings.

9.2. 2012 Q3/Q4

According to Geneva TAAM Minutes Belgium would be willing to host the TAAM in the second half of 2012.

9.3. 2013 Q1/Q2

According to Geneva TAAM Minutes Luxembourg would be willing to host the TAAM in the first half of 2013.

9.4. Future direction of TAAM

All TAAM delegates prepare comments and proposals for discussion.

TAAM Minutes:

TAAM 2012 Q3/Q4:
It was confirmed the next TAAM will be held in Belgium on 11 and 12 October 2012 (Brussels). Next ETAES Meeting will be held on 10 October 2012.

TAAM 2013 Q1/Q2:
It was confirmed the TAAM in first half of 2013 will be held in Luxembourg at the end of April.

TAAM 2013 Q3/Q4:
There are no volunteers yet for the hosting of the meeting to be held in Q3/Q4 2013.
Mr. Wrobel (GER) remarked, although there is still time, it would be fine to be in advance and know the place at least three of following meetings.

SUMMARY OF PAST TAAM

9 – 11 July 1997	Spain (Madrid)
11 – 12 December 1997	France (Paris)
8 – 10 June 1998	Germany (Flensburg)
19 – 21 January 1999	Luxemburg (Sandweiler)
8 – 10 June 1999	Sweden (Borlänge)
18 – 20 January 2000	United Kingdom (Bristol)
13 – 14 December 2000	The Netherlands (Delft)
6 – 7 June 2001	Norway (Sandvika)
21 – 22 November 2001	European Commission (Brussels)
4 – 5 June 2002	Finland (Tuusula)
16 – 17 December 2002	Belgium (Brussels)
9 – 10 July 2003	Germany (Flensburg)
4 – 5 February 2004	United Kingdom (Bristol)
21 – 22 September 2004	France (Paris)
9 – 10 March 2005	Spain (Madrid)
27 – 28 September 2005	Sweden (Borlänge)
5 – 6 April 2006	Ireland (Dublin)
28 – 29 September 2006	Austria and Hungary (Vienna)
22 – 23 March 2007	The Netherlands (Zoetermeer)
27 – 28 September 2007	Estonia (Tallinn)
9 – 10 April 2008	Germany (Leipzig)
9 – 10 October 2008	United Kingdom (Edinburgh)
26 – 27 March 2009	Switzerland (Bern)
8 – 9 October 2009	Slovenia (Brdo pri Kranju)
3 – 4 June 2010	Bulgaria (Sofia)
23 – 24 September 2010	Romania (Sibiu)
12 – 13 May 2011	Latvia (Riga)
21 – 22 November 2011	Germany, the Netherlands and United Kingdom (Geneva)
26 – 27 April 2012	Slovakia (Bratislava)

ANNEXES

Annex I: Guidance notes for the processing of the Multi-Stage Approvals (version 20 April 2011)

Annex II: Consolidated Meeting Notes for TAAM GSR Subgroup Meetings 1, 2 and 3

Annex III: Report of the 2nd Meeting of the TAAEG (6 June 2011), Item 5. (e)

GUIDANCE NOTES FOR THE PROCESSING OF MULTI-STAGE APPROVALS

Notes from the TAAM Subgroup meeting held in Borlänge Sweden on 2/3 February 2011 and in Köln on 20th April 2011

1. Introduction:

This guideline serves to answer major questions raised about the granting of type-approvals for vehicle types that are manufactured in multi-stage processes. It should provide guidance to Type Approval Authorities (TAA) and manufacturers for the EC type-approval process. However directive 2007/46/EC defines the legal framework so no legal rights can be derived from this guidance. It is the outcome of the Multi Stage Vehicles (MSV) subgroup of the TAAM. It is based on the corresponding articles of the directive 2007/46/EC

2. Applied Legislation:

This guideline takes into account the list of regulatory acts in Annex IV of directive 2007/46/EC. Articles 3, 4, 6 (5), 9 (2), 18 and the Annexes X, XI,, XVII and XVIII are to be observed in particular and giving the legal base.

3. Clarification of definitions for the multi-stage procedure:

The definitions are given in Article 3 of the dir. 2007/46/EC, therefore this paragraph is intended to simply provide clarification.

"Multi-stage type-approval": is the administrative process by which one or more Member States confirm – depending on the point reached in the type-approval process – that the type of an incomplete or completed vehicle fulfils the applicable technical requirements of directive 2007/46/EC.

"Base vehicle": Any vehicle which is used at the initial stage of a multi-stage process. Typically this would be an incomplete vehicle. (A complete vehicle might also be seen as a base vehicle). The vehicle identification number of a base vehicle is retained throughout successive stages of a multi-stage type-approval process.

"Complete vehicle": any vehicle which need not to be completed in order to meet the relevant technical requirements of directive 2007/46/EC.

"Incomplete vehicle": every vehicle which needs to undergo at least one further stage in order to be completed, in order to fulfil all the applicable technical requirements of directive 2007/46/EC.

"Completed vehicle": each vehicle that is subjected to a multi-stage type-approval process and complies with all applicable technical requirements of directive 2007/46/EC.

"Type of Vehicle": (criteria to be considered)

1. System approvals from an incomplete stage that are read across to a subsequent stage will retain the new type/ existing type definition from the earlier stage.
2. Judgements made in relation to new type and existing type criteria are determined within each system approval (not the incomplete/completed whole vehicle approval). E.g. an Euro 4 ap-

proval from the base vehicle remains valid (within the transitional provisions) for the following stages vehicle approval issued after the Euro 5 date , if there is no change in the system or vehicle category (subject to any special provisions in 2007/46/EC e.g. annex XI)

3. System approval that is made invalid by a subsequent stage will necessitate a new system approval (new system type).

"Regulatory act":

An EC/EU directive, EC/EU regulation or UNECE-regulation (scope in Annex IV and XI)

4. General Instructions: Approval Process (in running/relevant order)

4.1 Type-approval in accordance with 2007/46/EC Article 6	Provisions for multi-stage type-approvals according to Article 6, paragraph 5, multi-stage type-approvals.
4.2 Application	It is also to be stated in the application whether approval is sought for an incomplete vehicle (base vehicle), for a completed vehicle or for a vehicle in accordance with 2007/46/EC Annex XI (special purpose veh.). There are no fixed criteria for the number of systems approvals required for an incomplete vehicle, e.g. an incomplete motor vehicle without an engine is allowed. The manufacturer must provide sufficient information to enable the type-approval authority to confirm the category of the vehicle in each stage (M1,M2,M3 etc.). The same manufacturer may be the first stage and subsequent stage manufacturer. Based on the circumstances (2007/46/EC Article 6 paragraph 5), the type-approval of the base or incomplete vehicle must show all systems-approvals relevant for the respective point reached in production. A base vehicle could also be a complete/completed vehicle for which an EC type-approval has already been granted. It can then be regarded as an "incomplete vehicle" if the vehicle is altered in such a way that it is no longer covered by the original type-approval and to which an additional Certificate of Conformity (CoC) must be assigned. The final stage vehicle category determines the applicable provisions for the completed vehicle (2007/46/EC Annex IV, or Annex XI for SPV). Approvals from previous stages for other vehicle categories must be adapted.
4.3 Enclosures with the application	In addition to the enclosures to the application (list to be attached) written assurance is to be enclosed by the manufacturer of a second or further approval stage, that the necessary and suitable arrangements on the exchanging of documents and information in accordance with 2007/46/EC Annex XVII Section 1.1 have been made. These arrangements can also be dealt with in a contract in accordance with the attached model contract. In the case of the use of a base vehicle without its own EC vehicle type-approval then certificates of origin according to

	2007/46/EC Annex XVIII are to be enclosed for this vehicle in the necessary quantity to cover the range of variants and versions. To meet the provisions of 2007/46/EC Annex XVII (suitable arrangements) a contract might not always be required. The approval authority should decide case by case. Relevant/Important is the CoP. The following stage manufacturer must know, what are the design criterias of the base vehicle and if all components and systems are unchanged compared to the type-approval of the base vehicle. The following stage manufacturer shall have access to a list of all system approvals which are fulfilled by the previous approval stages for each Variant and Version (e.g. rear protective device, lateral protection device). The quantity and the quality of the scheduled changes in the following stages are important too for the kind of arrangement. Depending on this there are the following possible Solutions: 1. A contract about the exchange of information between the stage manufacturers 2. The manufacture shall explain, why a contract is not necessary, e.g.: a. The base vehicle manufacturer publish a bodybuilder manual (all necessary information can be supplied via Internet) and the following stage manufacturer works exclusive to this manual and commits this to the approval authority (see Annex 1 Part 3) b. Only minor changes in the following stage are made (e.g. mounting approved rear underrun protection or coupling device) judged by the TAA. c. the base vehicle manufacturer makes a unilateral declaration (see attached example in Annex 1 Part 2) If none of the above mentioned arrangements is met and the base vehicle manufacturer rejects to cooperate with the following stage manufacturer granting an EC-approval is not possible.,

4.4 Information folder

Multi-stage type-approvals can always be granted at the first and every further stage if all **type-approvals** have been submitted in accordance with the regulatory acts corresponding to the stage in the production of the vehicle (2007/46/EC Article 6, paragraph 5)

The second respectively following stage manufacturer should provide the type-approval certificates and information packages from each previous stage to the TAA and the documentation about the agreed suitable arrangements. For e.g. the bodybuilder guidelines or installation provisions should be provided, too.

Differing from this, however, it is permitted, upon receiving of permission from the approval authorities (TAA), to submit at each approval stage **either** systems-approvals or test reports as proof of the fulfilment of the separate directives. A mixed form of proof is permitted within one approval stage.

Where the 2007/46/EC Annex I or Annex III documentation requires the previous stage manufacturer to provide maximum or minimum permissible dimensions and masses, these represent the limit values to be observed by the subsequent stage manufacturers. If the limits are exceeded, then a new approval of the separate regulatory act is necessary E.g. Annex I 2.4.1.1.1 maximum permissible length.

For the second and each further production stage a copy of the type-approval certificate and its attachements of the preceding approval is to be enclosed.

Furthermore, documents are to be enclosed from which the alterations and additions that have been made to the previous approval stage are clearly visible. (2007/46/EC Article 6, paragraph 5).

4.5 Information document

The information documents are to be drawn up in accordance with 2007/46/EC Annex I or Annex III, Part I, corresponding to the approvalstage of the vehicle.
They are, however, only filled out to the extent which corresponds to the approval stage.
At each further approval stage, the information documents are to be submitted in accordance with annex I or annex III, part I, corresponding to the scope for which approval is being sought.
If test reports are submitted as proof of the fulfilment of the regulatory acts, then the information document for this subject matter is to be extended in the relevant sections according to the conditions of annex I.
[e.g. maximum values for M&D]

4.6 Matrix

If the presentation of the information required is carried out in a suitable way, the production of a matrix is not necessary.[reference to 2007/46/EC Annex III Part II]

4.7 List of the approval numbers according to the regulatory acts

The approvals for the regulatory acts are to be entered in this list insofar as they are applicable to the respective production stage. In this, the unaltered approvals from the preceding type-approvals are to be transferred to the following production stages.

If test reports are produced as proof of the fulfilment of regulatory acts, then corresponding characteristics (number of the test report) are to be listed in place of the approvals.

4.8 Other documents

Those documents are to be enclosed which relate to the work and alterations to be carried out at the respective production stage.

Listing of information in accordance with 2007/46/EC Annex VI, Side 2 for incomplete vehicles: this list is to be produced by the approval authorities as an attachment to EC type approvals. The same conditions apply for the test results in accordance with 2007/46/EC Annex VIII.

A document which contains the above-named information in accordance with 2007/46/EC Annex VI, Side 2, is also to be enclosed for type-approvals that already have an approval for complete/completed vehicles). Only those regulatory acts are to be listed which apply to the base vehicle and which are not affected by the next production stage.

4.9 Proof of the fulfilment of regulatory acts in the respective stage of production

In each individual stage of production, the manufacturer can choose whether the proof of the fulfilment of the regulatory acts is to be rendered by systems-approvals **or** through test reports.

It is therefore permissible that test reports for the altered aspects can be submitted for a base vehicle with its CoC, or certificate of origin, at the next stage of production. A mixture of systems-approvals and test reports within a production stage is permissible (reference 2007/46/EC Article 6 paragraph 5)

In case the requirements of the regulatory act have been amended, the latest provisions shall only be applied to those parts that are amended or added

to the previous stage; this option can only be used as long as the previous approval has not lost its validity for the registration of new vehicles.

4.10 Tests and inspections

The vehicle verification tests named according to 2007/46 Annex V section 1a) to 1d) correspond to those which are required for base vehicles and completed vehicles in annex XVII Section 2a), c), d), and e). have to be carried out for each approval stage.

Tests according to 2007/46/EC Annex V Section 3 are only to be carried out in special cases in which the compliance of alterations to a vehicle with the regulations is proven through test reports. In addition, tests are to be carried out in each case to ascertain whether all of the information corresponding to the respective approval stage is contained in the information folder. (2007/46/EC Annex XVII Section 2b)

4.11 Instructions on the testing and inspection (and their documentation in the test report)

They are to be carried out analogously to the process described in the regulatory act.

It is to be noted that, particularly with special purpose vehicles, the derogations permitted according to 2007/46/EC Annex XI as well as other exceptions that have been carried out on the vehicle in question are to be noted in the test report. (This also applies to derogations that have already been dealt with in a system-approval.)

They should be listed in a concentrated form in one place in the test report.

4.12 Listing of the test results

The values for a completed vehicle must be submitted in each case.

4.13 Handling of the CoC

Every base or preceding stage vehicle has to be accompanied by a CoC. The following stages do have to state the missing and/or changed parts of the vehicle systems and their entries in the CoC. Each stage has to have its own CoC.

Each stage manufacturer is obliged to deliver a CoC with the vehicle .

The following stage manufacturer should put a note on the complete/completed vehicle CoC that a 2nd stage CoC exists, to prevent the registration of the vehicle on the basis of just the base vehicle CoC.

This should be taken into account if the manufacturer supplies CoC data to the registration authority in electronic form (subject to any practical implementation implication).

[CO2-values shall be given by the base vehicle manufacturer (owner of the CO2 emissions approval) [waiting for the outcome of WG4]]

4.14 Certificate of origin Annex XVIII

When there is no CoC available because the vehicle is type-approved on a national base, for example, a certificate of origin is acceptable. According to the timetable of annex XIX EC type-approval for incomplete vehicles will become mandatory. From that moment certificates of origin will no longer be accepted.

4.15 Updating of Approvals / Extensions

The following stage approvals must be updated each time the previous stage has been extended, even when the changes do not affect the following stage. The approval no. with extension must be given on page 2 of the approval certificate. If the following stage manufacturer uses valid previous extensions of the preceeding stage vehicle to avoid additional administrative effort an update of his approval is not needed. [see example in Annex 1]

5. Additional Instructions:

5.1 Identification of the Vehicles

The manufacturers of a second or of each following production stage must affix an additional statutory plate to the vehicle in accordance with 2007/46/EC Annex XVII (Appendix). The statutory plate must correspond to the directive 76/114/EEC or regulation (EU) No. 19/2011. Details on this are to be found in the regulations.

Regarding masses this statutory plate shall contain information when changes have been made in the respective stage in relation to the previous stage.

Changing of the VIN of a base vehicle in the multi-stage type-approval process is not recommended. (ref. 4.1 (b) in 2007/46/EC Annex XVII).[annex XVII need to be amended]

5.2 How to deal with the recycling provisions between the stages (M1/N1)

No new approval is needed (the approval remain valid), when the following stage has no bad impact on the mass calculations (an arrangement between the manufacturer is necessary because the calculations must be available). In all other cases the approval will become invalid. A completely new system approval is necessary.

Note the scope and exemptions that are applicable in the framework directive and the separate technical regulatory acts (for e.g. M1-N1 Art 3 Sect. B 2005/64/EC).

The preliminary assessment is limited to the materials of the corresponding stage.

5.3 Regulation (EC) No. 715/2007

Beside the mandatory delivery of the Repair and Maintenance Information (RMI) by the base vehicle manufacturer, the manufacturers of the following stages shall add a declaration that the RMI information for their stage and for the previous stages are available. The final stage manufacturer should explain where the information for previous stages can be found (e.g. webpages, address).

The manufacturers and the approval authority must ensure that the requirements regarding exhaust emissions, CO2-emissions, On Board Diagnosis (OBD) and RMI are valid for the different stages. If this is not the case, because of e.g. the change of the vehicle category or class, inertia class, mass or fuel, a new approval has to be applied for. The latter can be the case when in a following stage, for example,:

- an LPG/CNG system is added,
- wider tyres are applied,
- parts are added to the exterior (spoillers, etc).
- etc.

Electric vehicle are in the scope of the Regulation with regard to RMI and electric energy consumption. These vehicles should get an approval without the required character according to Appendix 6 of implementing Regulation (EC) No. 692/2008.

California Code of Standards for small volume manufacturers, Annex I, 2.1:
The use of California code of standards for small volume manufacturers (Article 2 (32))is applicable.The corresponding character for the current emission limit should be given in accordance to the Environmental Protection Agency of the U.S. (EPA) [tbd]. Fuel consumption and CO2-emissions stay in accordance with EU legislation or UNECE regulation.

5.4 EC Small series

The base vehicle can be approved as a complete vehicle of EC small series. The number of vehicles must be clearly stated in the CoC (2007/46/EC Annex IX model A2). If the manufacturer uses the derogations it should be clearly stated in the information package.
An incomplete vehicle's CoC does not need to bear the sequential number for EC small series according to 2007/46/EC Article 18 (6).
TAA are free to apply this guideline also to their respective National Small Series schemes.

5.5 Granting of type-approvals for base vehicles with a special purpose

In cases when a preceding stage of a multi-stage approval was granted emissions approval under the provisions of Regulation EC/715/2007 Article 3 Section 2 and Chapter IV Article 10 Sections 2 and 3 (i.e. a 'vehicle designed to fulfil specific social needs'), the emissions approval shall not remain valid for the final stage unless the completed vehicle would also be classified as a 'vehicle designed to fulfil specific social needs'

Attached:

Annex 1. Part 1: Example for a contract/letters of co-operation in accordance with annex XVII

Part 2: Example of a statement about suitable arrangements

Part 3: Example of Bodybuilder Guidelines

Annex 2. Appointment of an authorised representative

Annex 1
Page 1 of 3

Part 1: Contractual agreement in accordance with annex XVII fig. 1.1 of the directive 2007/46/EC between company A and company B to be submitted to the Type Approval Authority (TAA).

§ 1

1. Company A confirms that it is the manufacturer in the sense of directive 2007/46/EC and that a statement of compliance with a time-limit has been submitted for it in accordance with annex X.

2. Company B confirms that it is the manufacturer in the sense of directive 2007/46/EC and that a statement of compliance with a time-limit has been submitted for it in accordance with annex X.

3. Should a statement of compliance be invalid, the contract partner is to be informed of this immediately.

§ 2

This contract is valid for the base vehicle manufactured by company A

Type.....

and the completed/incomplete vehicle made from it

Type.....

§ 3

The companies A and B are to exchange information with one another from which it can be observed that the technical requirements of all applicable separate directives have been met in accordance with annex IV or annex XI. The documents named comprise details on the approvals granted for systems, component parts and technical units as well as on vehicle parts that are part of the incomplete vehicle for which no approval has yet been granted.

Annex 1

§ 4

The companies A and B are to keep one another informed of all changes that they carry out on systems, component parts, technical units and vehicle parts.

§ 5

The companies A and B are to keep one another informed of addenda and supplements to EC or ECE approvals that are applied to systems, component parts and technical units as well as of the expiry of EC or ECE approvals.

§ 6

The companies A and B are to inform the TAA immediately about the alteration or termination of this contract.

Note:

This model contract is only an example of a contract on the passing on of information.
The meaning of the content can also be set out in another form.

Part 2: Example of a letter from the previous stage manufacturer regarding suitable arrangements for subsequent stage manufacturers

Attachment

To Bodybuilder A
Address

Dear Bodybuilder A,

EC Whole Vehicle Type Approval

This is to confirm our agreement to provide on-going access to relevant information regarding the {base vehicle Manufacturer's} model range in relation to the creation and maintenance of the multi-stage whole vehicle type approvals held by {Bodybuilder A}.

Bodybuilders' information, including chassis drawings, is available via website {www.****.com} and registration of your details will ensure that you will be alerted by email to any changes to the information.

If required, additional information may be obtained by contacting {a contact person} directly.

Best regards

Part 3: Example of bodybuilder manual guideline

Base vehicle manufacturers have to provide the appropriate data to complete the vehicle. Most of the manufacturers of e.g. commercial chassis vehicles do have a bodybuilder guideline which in most cases is available via internet/websites.

The minimum requirements for a manual/ guideline are the following :

1. All system approvals which are granted to the vehicle chassis for each Variant and Version (e.g. rear protective device, lateral protection device);

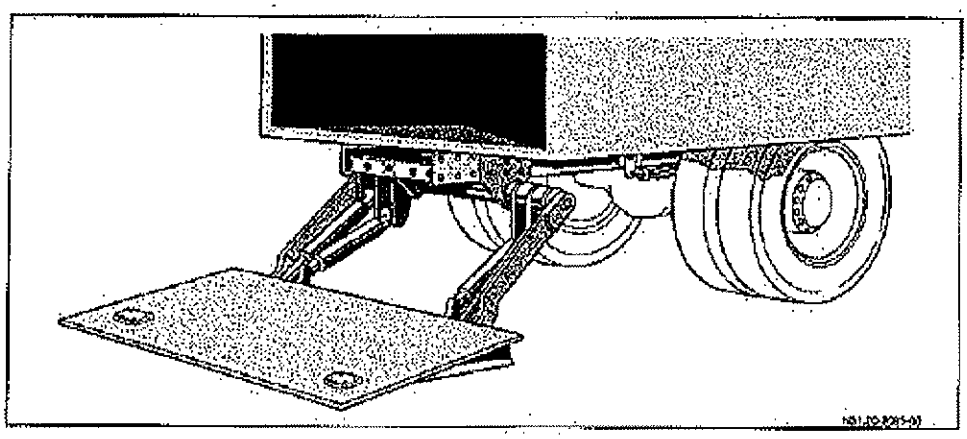
2. Covered masses and dimension

   including
   - the maximum completed mass
   - the maximum allowed reference mass for the emission approval (only for 715/2007)
   - the minimum rear overhang
   - the minimum front axle unladen mass (refer to COC if data available);

3. The center of gravity for the bodywork which is authorised regarding the different vehicle axles loads

4. Attachment of the bodywork or accessories on the chassis e.g.

   - forbidden welding point or
   - drilling point or
   - fixing points for the body



Example : installation of a plateform lift

5. Drawings

6. etc.

Annex 2

"Representative":
The representative is duly appointed by the manufacturer. This representative is not allowed to delegate competences to a third party without the permission of the manufacturer.

Appointment of an authorised representative

We, the company:

.....
(bearer of the approval)

.....
(street)

.....
(town)

.....
(country)

hereby appoint

.....
(authorised representative)

.....
(street)

.....
(town

.....
(country)

as our authorised representative, entitled to carry out all necessary measures in connection with the granting of permits/approvals by the Type Approval Authority for

.....
.....
(Name of the products, e.g.. vehicle category, kind of vehicle, component, technical unit,..)
(Type(s))

.....
.....

(If the proxy contains limitations, e. g. regarding certain EC-Framework Directives or Separate Directives and Regulations, ECE-Regulations, please specify them here.)

Annex 2

We declare ourselves in agreement that the measures introduced by our authorised representative have the same legal effect as if these measures had been introduced by us ourselves.

This power of attorney also includes the reception of written correspondence which is intended for our company.

The appointment of a further sub-attorney is ruled out.

Termination on the part of the authorised representative is to be announced immediately to the TAA.

.....	.....
(Place, date)	(Signature - Name and function please print addition-
ally -)	
	(Name of the company – as in the trade register -)

Confirmation of the authorised representative

We declare ourselves ready to take on the tasks of authorised representative for the above-named company.
We undertake to inform TAA immediately in writing of every change in our place of business.

.....	.....
(Place, date)	(Signature - Name and function please print addition-
ally -)	
	(Name of the company – as in the trade register -)

Note:

This model contract is only an example of a contract on the granting of the power of attorney.
The meaning of the content can also be set out in another form.

State: Mai 2011

TAAM Informal GSR Subgroup meeting

held at DRIEE, Paris

on 8 March 2012

Consolidated Meeting Notes for TAAM GSR Subgroup Meetings 1, 2 and 3

Meeting 1: 18/19 August 2011 (Bristol)
Meeting 2: 12/13 January 2012 (Flensburg)
Meeting 3; 8 March 2012 (Paris)

Attendees

	Meeting 1	Meeting 2	Meeting 3
Belgium	Wim Vandenplas	Wim Vandenplas	Wim Vandenplas
Estonia			Jurgo Vahtra
Finland	Marko Sinerkari Timo Kärkkäinen	Marko Sinerkari	Marko Sinerkari
France	Pierre Bazzucchi Matthieu Desinde	Pierre Bazzucchi	Pierre Bazzucchi Matthieu Desinde
Germany	Frank Wrobel Mark Wummel	Frank Wrobel Mark Wummel Sven Paeslack	Frank Wrobel
Latvia		Valdis Blekte	
Netherlands	Harry Jongenelen	Harry Jongenelen	Harry Jongenelen
Spain		Javier Fadrique	Ignacio Blanco Lluís Sans
Sweden	Tanja Vainionpää Per Lundberg	Tanja Vainionpää Per Lundberg	Pasi Paavola
UK	Tony Stenning (Chair) Derek Jones (Secretary)	Tony Stenning (Chair) Derek Jones (Secretary)	Tony Stenning (Chair) Derek Jones (Secretary)

Overview

The subgroup discussed the Commission proposal (including some proposed amendments from KBA) shown in Attachment 1 which makes provision (see Recital 6 on page 3 of the Commission Document) for a 'complete' GSR approval which can be issued on voluntary basis (i.e. a Regulation (EC) 661/2009 approval covering all the items within the GSR).

The subgroup's overall understanding of the GSR provisions can be summarised as follows:

A 'complete' GSR approval can only be issued when all the GSR requirements are met. This may be achieved by either for the three following approaches:

- **Step by step**
- **Single step**
- **Mixed**

The meeting agreed that the definitions in Article 2 for these three approaches should be as prescribed in the attached NL3 document from the Netherlands (Attachment 4).

GSR approval represents a form of 'mini-whole vehicle' approval or 'multi function system approval' within the overall 2007/46/EC whole vehicle approval.

The meeting considered that the vehicle type definition for a 'complete' GSR approval should be the same as the definition used by the manufacturer for the corresponding 2007/46/EC WVTA approval. The group recommends that this be put in the administrative provisions proposal.

For all individual subjects within the GSR the type definition will be those prescribed for each of the corresponding implementing measures.

The general view of the meeting was that there will be no real practical need for a specific 'complete' GSR approval and it is anticipated that most manufacturers will not use this option.

Reference Article 3 Section 4, the meeting agreed that, for subjects for which the test report approach is used (and an information document is not specified), the information document should be based on the relevant sections of 2007/46/EC Annex I.

When considering other sections of the proposed document the meeting agreed as follows:

- Annex 1 Section II (Page 10) Items 2, 3 and 4 can be taken to mean that there could be multiple test reports and multiple Technical Services.

- When a manufacturer chooses to obtain a 'complete' GSR approval, a list of all the requirements that have been met for that GSR approval should also be included in the whole vehicle type approval certificate as prescribed in the attached NL2 document from the Netherlands (Attachment 3).

- Annex II (Page 13) in footnote (***) add the clause 'or of Article 2(b) and 2(c) of this Regulation'

Consolidated report of GSR Subgroup Questions and Answers agreed during Meetings 1, 2 and 3

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

1.9.1. 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?

1.9.2. 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).

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)

The GSR approval numbering system has now been confirmed by the Commission in the administrative procedures- see Attachment 1.

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

For a specific 'complete' GSR certificate the GSR approval number format would be:
e42*661/2009*407/2011*1234*00

Provision needs to be made for partial approvals for new technologies (Ausnahmen**), virtual testing (V**irtuell**) and self-testing (S**elbst testen**). See Attachment 1**

Note: The approval number should include the character "A" (art. 20), "V" (art 11(3)) or "S" (art. 41 (6)) followed by the number of the UN Regulation including the series of amendment on which the exemption is based. For example:

- to Regulation (EC) 661/2009 applying the article 20 procedure for a coupling device

e2*661/2009*A55R-01*0001*00

- to Regulation (EC) 661/2009 applying the article 41(6) procedure for audible warning

e2*661/2009*S55R-01*0001*00

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: the group agreed that any 'complete' GSR approvals issued should be circulated via ETAES.

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)

The Commission has confirmed 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)

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 needed for existing vehicle types under provisions of GSR. (UK)

The Commission has confirmed that (apart from UN R13/13H and R100) the transitional provisions for UNECE Regulations (including UN R48 and R66) will apply. Hence, even after 1 November 2014, it is not necessary for DRL's to be fitted to vehicles already approved to UN R48.03.

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)

The document makes provision for a 'complete' GSR approval which can be issued on voluntary basis (i.e. a Regulation (EC) 661/2009 approval covering all the items within the GSR). This can only be issued when all the GSR requirements are met.

Alternatively, the subjects covered by 2007/46/EC Annex IV (including those prescribed by the GSR) can simply be covered separately without the need for a specific 'complete' GSR approval.

The proposed amendment of the administrative procedures address this issue - see Attachment 1.

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 an UN Regulation? (Germany)

This is taken into account in the draft proposal with the suggested amendments from Germany – see Attachment 1.

Note: ***An Article 20 exemption can currently 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. GSR Multi-stage implications
1) If the changes create a new system type. (UK)

2) 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.

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)

A General philosophy was agreed (with exception of France – see below*) as follows:

- Where there is a completely new technical subject that is not covered by the provisions of an existing regulatory act for vehicle approval (e.g. GSI) then the new type/existing type criteria for the introduction of new legislative requirements (e.g. new technology) will be based on the whole vehicle approval date.

- When requirements for a new technical subject are introduced by an existing regulatory act (e.g. ESC in R13H/R13) then the new type/existing type criteria for introduction of new legislative requirements will be based on the date of the vehicle system approval.

Hence, GSR requirements should be considered on a subject by subject basis against the individual system provisions and, if no changes are made to a previous stage system by a subsequent stage manufacturer, the previous stage system approval will remain valid for the completed whole vehicle approval.

For example, 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. The logic for this is that, although the multi-stage approval could create a new whole vehicle type for the completed vehicle, the requirements for ESC would only be considered in the context of the validity 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 systems approval which would not be invalidated. Hence, in this case, a new whole vehicle approval could be issued without ESC after 1 November 2011 (but before 1 November 2014) provided that the R13H approval for that vehicle has been issued before 1 November 2011.

However, a similar approach <u>cannot</u> be applied for the GSR provisions which are not covered in the first stage. For example, if the first/previous stage(s) do not cover items such as Gear Shift Indicators, Tyre Pressure Monitoring, Lane Departure Warning or Advanced Emergency Braking the final stage manufacture would (subject to the

relevant transitional provisions) have to cover the approval of these items in order to obtain a full 2007/46/EC EU Whole Vehicle approval.

It must be noted that the above general philosophy in not in line with the Commission's declared opinion that all new Whole Vehicle approvals (both single-stage complete and multi-stage completed approvals) must include ESC and other new GSR subjects according to the time-table for new types in 661/2009. *France reported that, pending any revised opinion from the Commission, it will follow the Commission view.

It is considered that the Commission's declared approach will make the multi-stage approval process almost unworkable for many second stage manufactures. For example, by just adding lights and spray suppression to a vehicle approved at the first stage with a valid brakes approval (as an existing type) without ESC, a second stage bodybuilder could become responsible for fitting ESC to the vehicle because the final completed whole vehicle would be a new type and, under the Commission's approach, it would therefore require ESC.

The group consider it to be essential that the Commission gives urgent consideration within the administrative procedures to situations where a second/subsequent stage manufacturer who, without invalidating any previous systems approvals, makes only minor additions to the previous stage vehicle but yet would then become obliged to also comply with these complex new subjects in order to obtain a 2007/46/EC for the completed vehicle.

Note: *If the first stage system approvals are affected by the second stage then the second stage manufacturer must comply with all the relevant requirements for new type (including ESC, GSI and TPM as appropriate).*

8. 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)

The Commission has proposed amendments to 2007/46/EC Annex IV Part II which do not yet recognise this point. This discussion is still ongoing. This group considers it to be critical that this issue is resolved before 1 November 2012.

If the 2007/46/EC Framework Directive was to take precedence then, for a Whole Vehicle approval issued using the Annex I test report approach, the test reports confirming compliance with the level of UN regulation called up in 2007/46/EC Annex IV Part II might be deemed to be acceptable.

However, it is understood that the Commission's view is that the transitional provisions of UN Regulations apply, including compliance with a higher level of Regulation than that which is specified in 2007/46/EC annex IV Part 2 if appropriate.

This illustrates the urgent need to clarify this conflict.

Note; *The original proposal for amendment to 2007/46/EC under the TCMV Small Series Subgroup deleted from 2007/46/EC Annex IV all the UN Regulation equivalents that are already covered by the list in GSR Annex IV.*

9. Will there be an implementing act specifying the provisions for the small series instead of the Partial Application (P/A) that has been introduced by the GSR? (NL)

A proposal has been discussed in the TCMV Small Series Subgroup. This discussion is still ongoing.
It is recommended that a similar proposal should also be discussed for Special Purpose Vehicles (2007/46/EC Annex XI).

10. 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)

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. This has now been confirmed by the Commission proposal – see Attachment 1

11. EC Regulation 661/2009 Article 7(5) 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.

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 or just those related to materials used in the **construction of the inside**? (NL)

Following the principle that UN Regulations apply as set out in their respective transitional provisions, the revised requirements of UN Regulation 118 will apply in full (including provisions for engine compartment).

12. 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_2 and M_3, 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_2 and N_3 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_3 and O_4 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)

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.

13. 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_2 , M_3 , N_2 , N_3 , O_3 and O_4 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_1 and N_1. Does it mean that for M_1 and N_1 old approval will remain valid? (NL)

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.

14. 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)

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.

15. 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 collum/or use existing collums with additional suppl. level for 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.

Option 'e' is agreed as a practical solution that can be implemented directly by the Type Approval Authorities by means of a TAAM agreement.

The Option 'd' would require agreement from the Commission which will be requested to amend 2007/46/EC Annex III accordingly. The Commission has agreed (at TAAEG february 2012) 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.

16. 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 means that M1 vehicles having ALSD installed need R89 (Supplement 1) certification by 1 Nov 2012 for new types – 1 Nov 2014 for existing types?

ECE 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 ASLD 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 ASLD, 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 ASLD 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 ASLD which are intended to be fitted to vehicles of categories M and N. (UK)

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

17. 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)

EC R90 is not required for replacement OE parts for vehicles approved under the provisions of UN R13H. The meeting view is that ECE R90 is not relevant for EU WVTA and so should not be included in the GSR list.

18. The implementing measure that mandates several UN-regulations for type approval requires that the vehicles fulfill Regulation R13/10. However it is also required that from 1-11-2011 for certain vehicles also ESC according R13/11 is needed. Does this mean that automatically a full approval according R13/11 is required or is still an approval for R13/10 sufficient and is a test report for ESC as addition acceptable? (NL)

The Transitional Provisions of R13 still apply in respect of brake system approval under 2007/46/EC Annex IV Item 9 (i.e. with or without ESC according to those transitional provisions) but then, in addition, the ESC test requirements must also be met in order to satisfy the provsions of the GSR.

19. Is the interpretation correct that article 13(14) overrules the mandatory application of UN-regulations according 407/2011 and that certain approvals remain valid , even after 1-11-2014? (NL)

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

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)

The validity of existing approvals is addressed by the Commission list identifying the subjects for which old approvals can continue to be extended and follows on from the provisions of 661/2009 Article 13 Section 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.***

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).

It is assumed that the Commission will fully maintain this list so that it is updated as soon as there is any future change in the relevant UN ECE Regulations and/or the GSR. The TAA's agreed to apply this list as it is written.

This list will be reviewed at each TAAM to ensure continued common understanding.
It was noted that the situation regarding subjects covered by EC Directives which have now been replaced by EU Regulations (e.g. Defrost/Demist. Wash/Wipe, VIN etc.) is addressed by the transitional provisions of each of the separate EU Regulations.

The meeting proposed that the table shown in Attachment 2 should be formally included in the draft amendments to the GSR implementing measures.

Note: ***A variation of this table is included in the proposal shown in Attachment 1.***

20. ESC for EC Small Series
2007/46/EC Annex IV will be amended to clarify that ABS and ESC are not mandatory for EC Small Series approvals. For EC Small Series approvals issued before the the clarification is in force can an approval be granted to a vehicle without ABS and ESC?

For EC Small Series approvals, the current legislation requires only Partial Approval for subjects covered by the GSR and the Commission are required to clarify the scope of the partial application of the requirements. The Commission have now clarified that ABS and ESC will not be required for EC Small Series approvals.

The meeting agreed that ECSmall Series approvals for vehicles without ABS and ESC can be issued before the legislation is formally amended.

21. End of Series Provisions for GSR

End of Series provisions will apply to GSR items

Derek Jones
TAAM GSR Subgroup Secretariat
8 March 2012

Consolidated Meeting Notes for TAAM GSR Subgroup Meetings 1, 2 and 3

ATTACHMENT 1

COMMISSION PROPOSAL WITH ADDITIONAL PROPOSALS FROM KBA

MARCH 2012

EUROPEAN COMMISSION

Brussels, XXX
D016965/03
[…](2012) XXX draft

Draft

COMMISSION REGULATION (EU) No …/..

of XXX

on specific procedures, tests and technical requirements for the type-approval of motor vehicles, their trailers and components and separate technical units with regard to their general safety, as laid down in Regulation (EC) No 661/2009 of the European Parliament and of the Council, and amending Directive 2007/46/EC of the European Parliament and of the Council

(Text with EEA relevance)

DRAFT (for discussion)

COMMISSION REGULATION (EU) No …/..

of XXX

on specific procedures, tests and technical requirements for the type-approval of motor vehicles, their trailers and components and separate technical units with regard to their general safety, as laid down in Regulation (EC) No 661/2009 of the European Parliament and of the Council, and amending Directive 2007/46/EC of the European Parliament and of the Council

(Text with EEA relevance)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EC) No 661/2009 of the European Parliament and of the Council of 13 July 2009 concerning type-approval requirements for the general safety of motor vehicles, their trailers and systems, components and separate technical units intended therefor[1], and in particular Article 14(1)(a) thereof,

Whereas:

(1) Regulation (EC) No 661/2009 is a separate Regulation for the purposes of the type-approval procedure provided for by Directive 2007/46/EC of the European Parliament and of the Council of 5 September 2007 establishing a framework for the approval of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles (Framework Directive)[2].

(2) Regulation (EC) No 661/2009 lays down basic requirements for the type-approval of motor vehicles, their trailers and systems, components and separate technical units intended therefor with regard to their safety.

(3) It is necessary to lay down technical requirements to be fulfiled for the type-approval of motor vehicles, their trailers and systems, components and separate technical units intended therefor.

(4) It is also necessary to set out specific procedures for type-approval, namely administrative provisions as well as a numbering system applicable under Regulation (EC) No 661/2009.

---

1 OJ L 200, 31.7.2009, p. 1.
2 OJ L 263, 9.10.2007, p. 1

(5) It is necessary to amend Part III of Annex III and Annex VII to Directive 2007/46/EC.

(6) Without prejudice to the list of mandatory regulatory acts setting the requirements for the purpose of EC type-approval of vehicles laid down in Annexes IV and XI to Directive 2007/46/EC, including those mandatory regulatory acts listed as sub items under item number 63 in these Annexes, Regulation (EC) No 661/2009 provides vehicle manufacturers with the possibility to voluntarily submit an application for General Safety EC type-approval covering all relevant item numbers and sub items under item number 63 listed in Annexes IV and XI to Directive 2007/46/EC. A General Safety EC type-approval shall therefore not be issued if the requirements of only some of the mandatory regulatory acts are fulfilled.

(7) The measures provided for in this Regulation are in accordance with the opinion of the Technical Committee – Motor Vehicles,

(8) It is necessary to keep the procedures for self-testing and virtual testing after the deletion of the EC regulatory acts in Annex IV of 2007/46/EC.

(9) It is necessary to make clear for which approvals of the outdating EC regulatory acts from Annex IV of 2007/46/EC extensions are seen as legally correct.

(10) It is necessary to ensure the procedure for exemptions for new technologies or new concepts based on the requirements of UN regulations.

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HAS ADOPTED THIS REGULATION:

Article 1

Subject matter

This Regulation lays down detailed rules concerning the specific procedures of optional EC type-approval pursuant to Regulation (EC) No 661/2009.

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This Regulation also makes provisions for self-testing and virtual testing, extensions of approvals and exemptions for new technologies or concepts for the cases where no separat EC legal act exists any longer.

Article 2

Choice of procedure

To obtain an optional type-approval pursuant to Regulation (EC) No 661/2009, a manufacturer shall choose one of the following procedures:

(a) step-by-step EC type-approval according to each relevant requirement of Regulation (EC) No 661/2009;

(b) single-step EC type-approval according to all relevant requirements of Regulation (EC) No 661/2009;

(c) mixed EC type-approval according to a part of the relevant requirements of Regulation (EC) No 661/2009, for which system approvals have not been obtained , and the remaining part of the relevant requirements of that Regulation, for which system approvals have been obtained.

Article 3

Application

1. A manufacturer or his representative shall submit to the type-approval authority an application drawn up in accordance with the model of the information document set out in Part 1 of Annex I to this Regulation, including the specific information as required by Part III of Annex III to Directive 2007/46/EC and specific information required for each type of procedure referred to in Article 2, as laid down in paragraphs 2, 3 and 4 of this Article.

2. An application for step-by-step EC type-approval shall consist of the information folder containing the information required under the separate implementing measures of the Regulation (EC) No 661/2009, based on the item numbering of Annex I to Directive 2007/46/EC and shall be accompanied by the complete set of relevant type-approval certificates required pursuant to each of the applicable regulatory acts listed, in the case of vehicles, in Annex IV or, in the case of special purpose vehicles, in Annex XI to that Directive.

3. An application for single-step EC type-approval shall consist of the information folder containing the information required under the separate implementing measures of Regulation (EC) No 661/2009, based on the item numbering of Annex I to Directive 2007/46/EC and shall be accompanied by the complete set of relevant test reports covering each of the applicable regulatory acts, in the case of vehicles, in Annex IV or, in the case of special purpose vehicles, in Annex XI to that Directive.

4. An application for mixed EC type-approval shall consist of the information folder containing the information required under the separate implementing measures of Regulation (EC) No 661/2009, based on the item numbering of Annex I to Directive 2007/46/EC and shall be accompanied by the following:

(a) a set of type-approval certificates covering a part of the applicable regulatory acts listed, in the case of vehicles, in Annex IV or, in the case of special purpose vehicles, in Annex XI to that Directive;

(b) a set of test reports covering the remaining applicable regulatory acts listed, in the case of vehicles, in Annex IV or, in the case of special purpose vehicles, in Annex XI to that Directive.

Article 4

Type-approval

1. Where the vehicles presented for type-approval comply with the relevant requirements of Regulation (EC) No 661/2009 and where the applicant fulfills the relevant requirements laid down in Article 3 of this Regulation, the type-approval authority shall grant an EC type-approval pursuant to Regulation (EC) No 661/2009 and issue a type-approval number in accordance with the numbering system set out in Annex VII to Directive 2007/46/EC.

   A Member State may not assign the same number to another vehicle type.

2. For the purposes of paragraph 1, the type-approval authority shall deliver an EC type-approval certificate established in accordance with the model set out in Part 2 of Annex I .

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Article 4a

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Exemptions for new technologies or new concepts

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1. The procedure laid down in Article 20 of Directive 2007/46/EC can be applied for types of systems, components or separate technical units referred to in Annex IV of Regulation (EC) No. 661/2009.

Article 4b

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Tests required to EC type-approval

1. The procedures laid down in Article 11 para 3 of Directive 2007/46/EC may be used as alternatives to the test procedures laid down in the UN regulations of Annex IV of Regulation (EC) No. 661/2009.

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Article 4c

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

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 vehicle types under the terms of the respective repealed EU Directives following the indications in the table set out in Annex III.

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Article 5

Amendments to Directive 2007/46/EC

Annexes III, VII and XV to Directive 2007/46/EC are amended in accordance with Annex II to this Regulation.

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Article 6

Entry into force

This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union.*

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

For the Commission
The President
[…]

ANNEX I

Administrative provisions for the type-approval of vehicles with regard to their general safety

PART 1

Information document

MODEL

Information document No ... relating to the EC type-approval of a vehicle with regard to its general safety.

The following information, if applicable, shall be supplied in triplicate and include a list of contents. Any drawings shall be supplied in appropriate scale and in sufficient detail on size A4 or on a folder of A4 format. Photographs, if any, shall show sufficient detail.

If the systems, components or separate technical units referred to in this information document have electronic controls, information concerning their performance shall be supplied.

Addendum 1

All relevant items and information required under the separate implementing measures of Regulation (EC) No 661/2009, based on the item numbering of Annex I to Directive 2007/46/EC (i.e. the complete list of information for the purpose of EC type-approval of vehicles) in accordance with paragraphs 2 to 4 of Article 3 of this Regulation, shall be provided by the vehicle manufacturer, as agreed by the technical service and type-approval authority responsible for issuing the optional approval according to Regulation (EC) No 661/2009

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Addendum 2

All relevant items and information required in accordance with Part III of Annex III to Directive 2007/46/EC with respect to the relevant type-approvals for each subject covered by Regulation (EC) No 661/2009 and its implementing measures shall be provided by the vehicle manufacturer

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Item number and Subject	*Type-approval number or test report number (***)*	*Date of issue of the type-approval or of its extension or of the test report*	*Member State or Contracting Party (*) issuing the type-approval (**) or technical service issuing the test report (***)*	*Reference to the regulatory act and its last amendment*	*Variant(s)/ version(s)*

(*) Contracting Parties to the Revised 1958 Agreement.

(**) To be indicated if not obtainable from the type-approval number.

(***) To be indicated when the manufacturer applies the provisions of Article 9(6).

Signed: . . . . . .
Position in company: . . . . . .
Date: . . . . . .

PART 2

EC type-approval certificate

MODEL

Format: A4 (210 × 297 mm)

EC TYPE-APPROVAL CERTIFICATE

Stamp of type-approval authority

Communication concerning:

- EC type-approval ([1])
- extension of EC type-approval ([1])
- refusal of EC type-approval ([1])
- withdrawal of EC type-approval ([1])

of a type of vehicle with regard to the general safety of motor vehicles and their trailers

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with regard to Regulation (EC) No 661/2009, as last amended by Regulation (EU) No …/… ([1])

EC type-approval number: . . . . . .

Reason for extension: . . . . . .

SECTION I

0.1. Make (trade name of manufacturer): . . . . . .

0.2. Type: . . . . . .

0.2.1. Commercial name(s) (if available): . . . . . .

0.3. Means of identification of type, if marked on the vehicle ([2]): . . . . . .

0.3.1. Location of that marking: . . . . . .

0.4. Category of vehicle ([3]): . . . . . .

0.5. Name and address of manufacturer: . . . . . .

([1]) Delete where not applicable.

([2]) If the means of identification of type contains characters not relevant to describe the vehicle, component or separate technical unit types covered by this information document, such characters shall be represented in the documentation by the symbol "?" (e.g. ABC??123??).

([3]) As defined in Directive 2007/46/EC, Annex II, Section A.

0.8. Name(s) and address(es) of assembly plant(s): . . . . . .

0.9. Name and address of the manufacturer's representative (if any): . .. .

SECTION II

1. Additional information: see Addendum.

2. Technical service responsible for carrying out the tests: . . . . . .

3. Date of test report: . . . . . .

4. Number of test report: . . . .

5. Remarks (if any): see Addendum.

6. Place: . . . .

7. Date: . . . . . .

8. Signature: . . . . . .

Attachments: Information package

Test report

Addendum 1

To General Safety EC type-approval certificate No …

This EC type-approval is, where variants or versions are concerned, based on the approval(s) for vehicles listed below:

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Stage 1: Manufacturer of the base vehicle:

EC type-approval number:

Dated:

Applicable to variants or versions (as appropriate):

Stage 2: Manufacturer:

EC type-approval number:

Dated:

Applicable to variants or versions (as appropriate):

Stage 3: Manufacturer:

EC type-approval number:

Dated:

Applicable to variants or versions (as appropriate):

In the case where the approval includes one or more incomplete variants or versions (as appropriate), list those variants or versions (as appropriate) which are complete or completed.

Complete/completed variant(s):

List of requirements applicable to the approved vehicle type, variant or version (as appropriate, taking account of the scope and latest amendment to each of the regulatory acts listed below).

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Item	Subject	Regulatory act reference	Last amended	Applicable to variant or, if need be, to version
…	…	…	…	…

Deleted: (List only subjects for which an EC type-approval exists.)¶

Addendum 2

To General Safety EC type-approval certificate No …

1. Additional information:

1.1. Brief description of the vehicle type as regards its structure, dimensions, lines and constituent materials: . . . . . .

2. Deleted

Incomplete vehicle: yes / no (1)

3. Deleted

Completed vehicle: yes / no (1)

4. Step-by-step / single-step / mixed (1) type-approval procedure

5. Remarks: . .. .

ANNEX II

Amendments to Directive 2007/46/EC

Directive 2007/46/EC is amended as follows:

(1) in Part III of Annex III, the first paragraph with its table is replaced by the following:

"Supply the information required by the following table regarding the applicable subjects for the vehicle type, variants and versions in Annex IV or Annex XI. All relevant type-approvals for each subject, including the individual subjects covered by Regulation (EC) No 661/2009 and its implementing measures, shall be listed. However, it is not required to provide type-approval numbers and markings with respect to components and separate technical units in the table as long as the installation of the type-approved components and separate technical units is covered by the relevant system type-approval.

Item number and Subject	*Type-approval number or test report number (***)*	*Date of issue of the type-approval or of its extension or of the test report*	*Member State or Contracting Party (*) issuing the type-approval (**) or technical service issuing the test report (***)*	*Reference to the regulatory act and its last amendment*	*Variant(s)/ version(s)*

(*) Contracting Parties to the Revised 1958 Agreement.

(**) To be indicated if not obtainable from the type-approval number.

(***) To be indicated when the manufacturer applies the provisions of Article 9(6).

Signed: . . . . . .
Position in company: . . . . . .
Date: . . . . . ";

(2) Annex VII is amended as follows:

(a) In Section 2, the following paragraph is added :

"In the case of EC type-approval for systems, components or separate technical units covered by Regulation (EC) No 661/2009, the base Regulation shall be the EU implementing act adopted pursuant to Article 14(1)(a) to (e) of Regulation (EC) No 661/2009.";

"In the case of EC type-approval for systems, components or separate technical units granted in accordance with the procedure described in article 11(3), 20, or 41(6) where no single EC legal act exists, the base Regulation shall be Regulation (EC) No 661/2009."

(b) Section 3 is amended as follows:

(i) the first paragraph is replaced by the following:

"The number of the latest amending Directive or Regulation, including implementing acts applicable to the type-approval in accordance with the following indents, or, where such amending Directive or Regulation or applicable implementing acts do not exist, the number referred to in Section 2:";

(ii) the following indent is inserted after the third indent:

"—— this means the latest Regulation, containing amendments to implementing measures of Regulation (EC) No 661/2009, with which a system, component or technical unit complies,";

"In the case of EC type-approval for systems, components or separate technical units granted in accordance with the procedure described in article 20, article 11(3) or article 41 (6) where no single EC legal act exists, the character "A" (art. 20), "V" (art 11(3)) or "S" (art. 41 (6)) followed by the number of the UN Regulation including the series of amendment on which the exemption is based".

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(c) In paragraph 4.1., the following points are added:

"(c) to Regulation (EC) 661/2009 (General Safety Regulation)

e2*661/2009*407/2011*0003*00

(d) to Commission Regulation (EU) 1008/2010(*) (windscreen wiper and washer systems)

e2*1008/2010*1008/2010*0003*00

(e) to Regulation (EC) 661/2009 applying the artikel 20 procedure for a coupling device

e2*661/2009*A55R-01*0001*00"

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(f) to Regulation (EC) 661/2009 applying the artikel 41(6) procedure for audible warning

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(3) Annex XV is amended as follows:

The list of regulatory acts and restrictions is replaced by the following:

2. List of regulatory acts and restrictions

	Regulatory act reference	Subject
4.	Rear registration plate space	(EU) No. 1003/2010
7.	Audible warning	UNECE-R 28
18.	Plates (statutory)	(EU) No. 119/2011
20.	Installation of lighting and light signalling devices	UNECE-R 48
27.	Towing hooks	(EU) No. 105/2010
33.	Identification of controls, tell-tales and indicators	UNECE-R 121
34.	Defrost/demist	(EU) No. 672/2010
35.	Wash/wipe	(EU) No. 1008/2010
36.	Heating systems Except the provisions in Annex VIII relating to installation requirements of LPG heating systems in vehicle	UNECE-R 122
37.	Wheel guards	(EU) No. 1009/2010
44.	Masses and dimensions (cars)	(EU) No. XXX/2012
45.	Safety glazing Restricted to the provisions included in Annex 21 to UNECE Regulation 43	UNECE-R 43
46.	Tyres	UNECE-R
	Installation of tyres	(EU) No. 485/2011
49.	External projections of cabs	
50.	Couplings Restricted to the provisions included in Annexes V (up to and including Section 8) and VII	UNECE-R 55
61.	Air-conditioning system	2006/40/EC

(3) Annex XVI is amended as follows:

(a) **The list of regulatory acts is replaced by the following:**

1. List of regulatory acts

No.	Regulatory act reference	Subject

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3.	Fuel tanks/rear protective devices	
6.		
8.		
12.		
16.		
20.	Installation of lighting and light signalling devices	UNECE-R 48
27.	Towing hooks	(EU) No. 105/2010
32.		
35.	Wash/wipe	(EU) No. 1008/2010
37.	Wheel guards	(EU) No. 1009/2010
42.		
49.	External projections of cabs	
50.	Couplings Restricted to the provisions included in Annexes V (up to and including Section 8) and VII	UNECE-R 55
52.		
57.		

(B) Appendix 2

The list of the specific conditions concerning virtual testing methods is replaced by:

1. List of regulatory acts

ANNEX III

List of repealed Directives according to Article 13 of Regulation (EC) No 661/2009

EC Directive	UNECE Regulations	
Fuel tanks/rear protective devices	34, 67, 110, 58	
Steering effort	79	
Audible warning	28	

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Indirect vision devices	46	
Radio interference	10	
Interior fittings	21	
Anti-theft and immobiliser	18, 116, 97	
Protective steering 1)	12	
Exterior projections 2)	26	
Speedometer and reverse gear	39	
Installation of lighting and light signaling devices	48	

1) Except for electric vehicles with propulsion batteries filled with liquid electrolyte

2) except for shark fin antennas

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Consolidated Meeting Notes for TAAM GSR Subgroup Meetings 1, 2 and 3

ATTACHMENT 2

NL1: "VALIDITY AND EXTENSION OF APPROVALS GRANTED UNDER EU DIRECTIVES REPEALED BY REGULATION (EC) NO 661/2009 ON GENERAL SAFETY OF MOTOR VEHICLES

. **EU Directives**	**UNECE Regulations**	**Is an extension of approval possible?**
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
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), rearposition (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
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
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

Consolidated Meeting Notes for TAAM GSR Subgroup Meetings 1, 2 and 3

ATTACHMENT 3

NL2: Proposal from the Netherlands for the draft regulation on the administrative provisions for the GSR type approval. (version 20120110)

Background:
In case of an approval of a vehicle type for the entire GSR regulation for all of the technical items covered by that regulation it is necessary that the type approval certificate for the GSR indicates on what level the applicable regulations have been used. This suggestion has already taken on board by the Commission in its draft for the administrative provisions for a GSR approval.

In the mean time it has become clear for RDW that such information is also needed for a WVTA which is based on such a GSR-approval; verification of the validity of an approval and the application of the end-of-series provisions can not be done without that information. Therefor RDW suggests amending the template for the EC type approval certificate according Model A, page 2 as follows:

Proposal:
Add at the end of page 2 of MODEL A of Annex VI to Directive 2007/46/EC (after the table for special purpose vehicles and new technologies) the following text:

"In case of an approval for EC Regulation No. 661/2009, list of requirements that are covered by that regulation and that are applicable to the approved vehicle type (as appropriate, taking account of the scope and latest amendment to each of the regulatory acts listed below).

Item	Subject	Regulatory act reference	Last amended	Applicable to variants

".

Note: the proposal above is based on the ideas for a new Annex IV to Directive 2007/46/EC where the UN-regulations and implementing measures for the GSR will get in some way an item or sequence number in Annex IV to 2007/46/EC like the present directives have at the moment.

ATTACHMENT 4

NL3: Proposal from the Netherlands for the draft regulation on the administrative provisions for the GSR type approval.

Background:

The intention of article 2 is to clarify that the manufacturer can choose between a step by step procedure, a single step procedure and a mixed procedure for getting an approval for all technical requirements covered by the GSR. There are some doubts that the wording of article 2 as proposed by the Commission, especially the use of the words "according to" really reflects this.

In addition, the definitions of these 3 procedures in article 3 of 2007/46/EC only deal with EC whole vehicle type approval and are not suitable for use in this Regulation on system approvals. It is preferable to integrate the ideas behind these 3 procedures in the formulation of article 2.

Proposal:
Article 2 shall be amended as follows:

Article 2

Choice of procedure

To obtain a type-approval pursuant to Regulation (EC) No 661/2009, a manufacturer shall choose one of the following procedures:

(a) step-by-step EC type-approval consisting in the step-by-step collection of the whole set of EC type-approval certificates for each relevant requirement of Regulation (EC) No 661/2009;

(b) single-step EC type-approval consisting in the approval of a vehicle as a whole by means of a single operation for all relevant requirements of Regulation (EC) No 661/2009;

(c) mixed EC type-approval where for a part of the relevant requirements of Regulation (EC) No 661/2009 system approvals have not been obtained, and for the remaining part of the relevant requirements of that Regulation, system approvals have been obtained.

(e) Clarification about the application of Directive 2006/40/EC (Mobile Air-Conditioning Systems) to multi-purpose vehicles like motorhomes (IT)

***Issue**:* IT requests clarification on the application of the MAC Directive, since there are implications on the activities of SMEs which operates in the field of multi stage approvals.

It is the case of multi purpose vehicles like motorhomes for which a specific note was sent to EC at the TCMV of 15 April 2009. These vehicles are built up on N1 vehicles (normally class II or III) and in a second stage become M1 vehicles which according to Directive 2007/46/EC annex XI appendix I item 61 should be fitted with MAC meeting the requirements of Directive 2006/40/EC.

This means that the manufacturer of the stage 1 (N1 vehicle, class II or III) does not have to have a 2006/40/EC type approval but the manufacturer of the finished stage M1 vehicle must have the approval which does not seem reasonable. In this respect we think that Directive 2007/46/EC annex XI appendix I, item 61 should be changed by introducing a code "G" which 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".

Pending your decision on the above issue I would like to draw your attention on the problems that several SMEs operating as second stage manufactures are facing with. These SMEs find on the market N1 base vehicles only fitted with MAC wich do not meet the requirements of Directive 2006/40/EC since these vehicles have been legitimately type approved before 1st January 2011 (they contain a refrigerant with GWP >150).

The second stage manufacturer would like to complete (after 1st January 2011) the vehicle which will become a motor home classified in category M1 and would like to get a whole vehicle approval based on a first stage CoC which does not include conformity to MAC Directive. We would like to have confirmation about the possibility to issue a multi- stage approval on the conditions described above, up to 2017. This would be the only possibility for a second stage manufacturer to built up and sell motor homes without waiting first stage manufacturers to provide them base vehicles certified according to MAC Directive; we know that at present the availability of new refrigerant(s) is not guaranteed and for this reason manufacturers may have concentrated type approval activities before December 2010.

Finally, a more general problem for multistage manufacturers - always linked to MAC Directive - relates to M1 vehicles type approved before 31 December 2010, not meeting MAC Directive which could be registered up to 2017. These complete vehicles are converted in a second stage (for example to LPG) and a WVTA is granted to a second stage manufacturer. In our opinion, the application of multistage approval is possible up to 2017 as long as the changes made by the second stage manufacturer does not affect air conditioning systems which would remain the original one (not meeting MAC directive).

Option proposed by the EC:

EC recognises that this issue, although being limited from a global view on the effects of the MAC Directive, can be very burdensome for SME.

Probably the insertion of letter 'X' in item 61 of Appendix 1 to Annex XI of the automotive Framework Directive was an error at the first place, and the 'X' should be replaced by a letter 'G', which would solve the concerns.

On a more long term basis EC will have to consider the extension of the MAC Directive to all N1 vehicles (including the heavier ones) and possibly heavy duty vehicles, see Article 8 of 2006/40/EC (a COM report on this issue would be due on 4 July 2011) via co-decision.

For the concrete issue (suggestion to perform the change described above via Comitology) EC could e.g. attach such change to a future proposal. EC will also need to evaluate if this change can be done via Comitology, i.e. whether it is an "administrative provision for EC type approval" according to Article 7 of 2006/40/EC.

Questions/answers:

The representative of the European Commission referred that this issue was also included in the letter from ACEA and that the EC supports the issue in substance, but needs to check how to implement it in legal terms.

DE underlined that, regarding air-conditioning, the N1 chassis cannot be given approval. The new Annex II of the framework directive can give a solution (point 7: authorities can type-approve vehicles that can be transformed). The authorities may use Annex II when it is published to f-give AC approval to eh chassis. The EC representative agreed, although the concern by IT is more commercial, related to difficulties of small companies to comply with MAC requirements. DE considered that this is not an acute problem, while FR recognised that there was no clear solution for the problem. DE referred the possibility to change the letter X by G and not have AC requirement s in N category.

The Chair referred that the EC does not intend to extend the legislation to N Category. The Chair concluded that the EC will evaluate the way forward, considering that the intention of the legislation was not to extend the AC requirements to this kind of vehicles.