

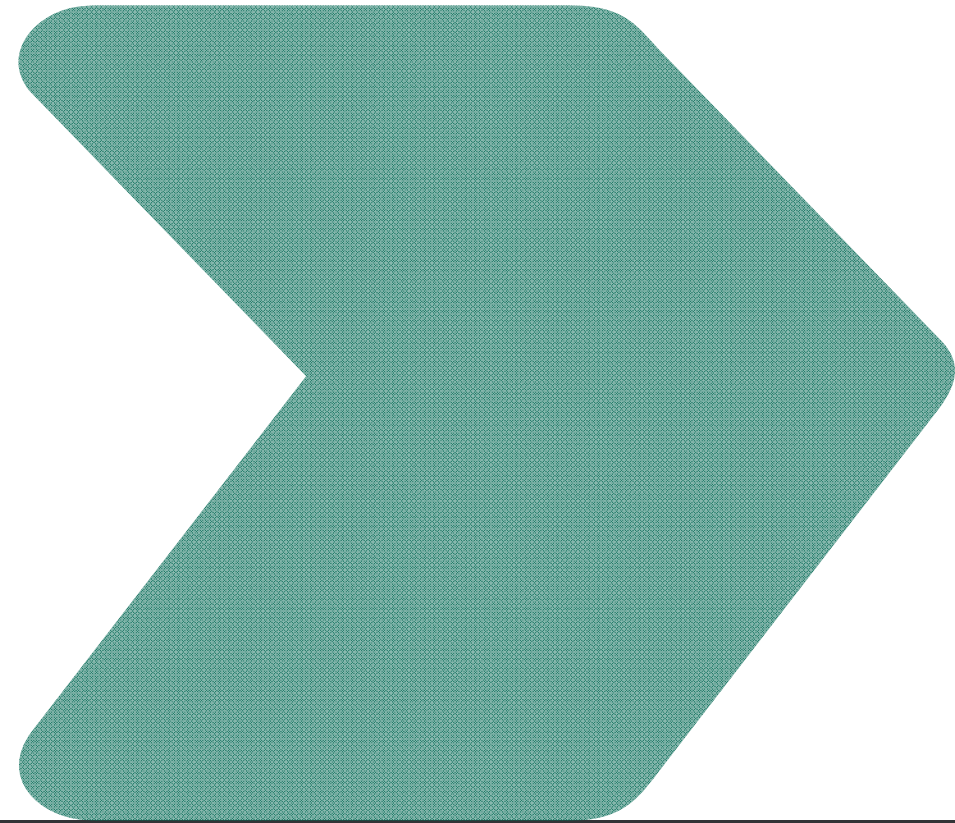
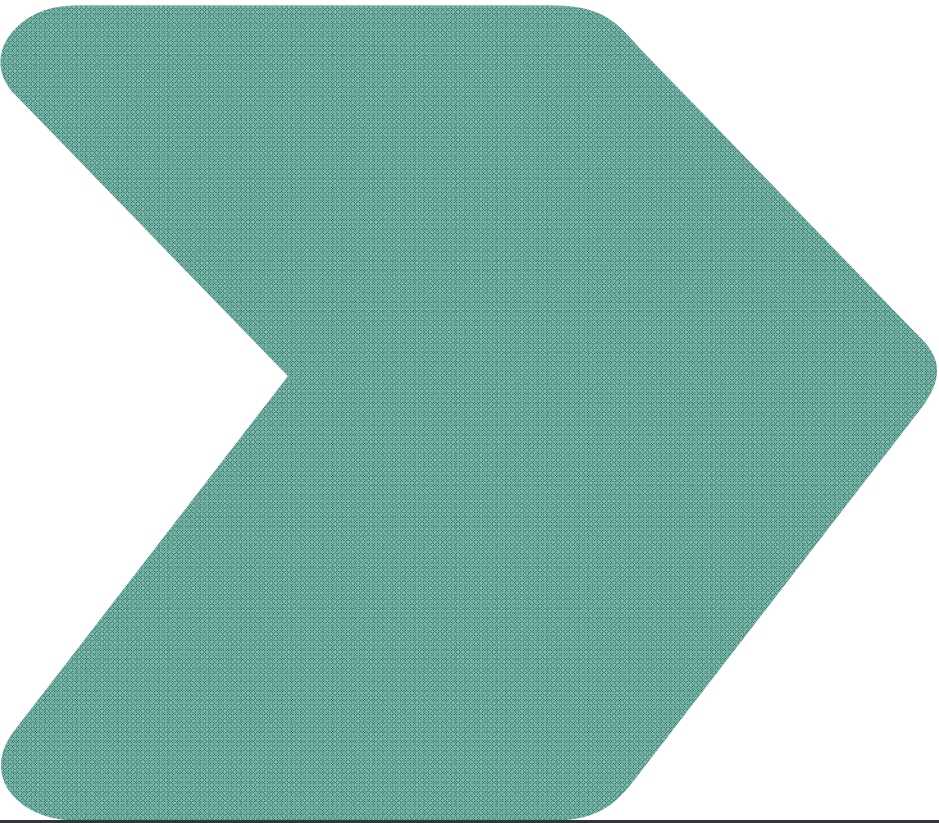
UK TAAM

Birmingham 2019

Meeting date and Venue and Time	16 th January 2019 – 17 th January 2019 Hilton Metropole Hotel Birmingham			
Attendees	Luxembourg	Luc schmitt	Spain	Javier Fadrique
		Laurent Linden	Romania	Bogdan Toader
	Sweden	Tanja Vainionpaa		Alin Rosca
		Bo Nilsson	UK	Derek Lawlor
	Austria	Franz Wurst		Chris McCabe
		Franz Hoeller		Mike Protheroe
	Iceland	Kristinn Gretarsson		Gareth Jones
		Ólafur Arnar Gunnarsson		Dawn Crooks
	Ireland	Rory Brennan		Stephen Trenoweth
		Mary Madigan		Steve Holdcroft
	Netherlands	Hans Lammers		Adrian Burrows
		Ramon Gouweleeuw		Paul Rothwell
	Poland	Kaja Witkowska		
	Germany	Sven Paeslack		
	Finland	Harri Tenhunen		
		Henri Takkinen		
	Estonia	Jurgo Vahtra		
Slovakia	Lubomir Moravcik			
	Jan Javorcik			

Agenda Item 1: Presentations by VCA and UK Department for Transport

United Kingdom TAAM Birmingham 2019



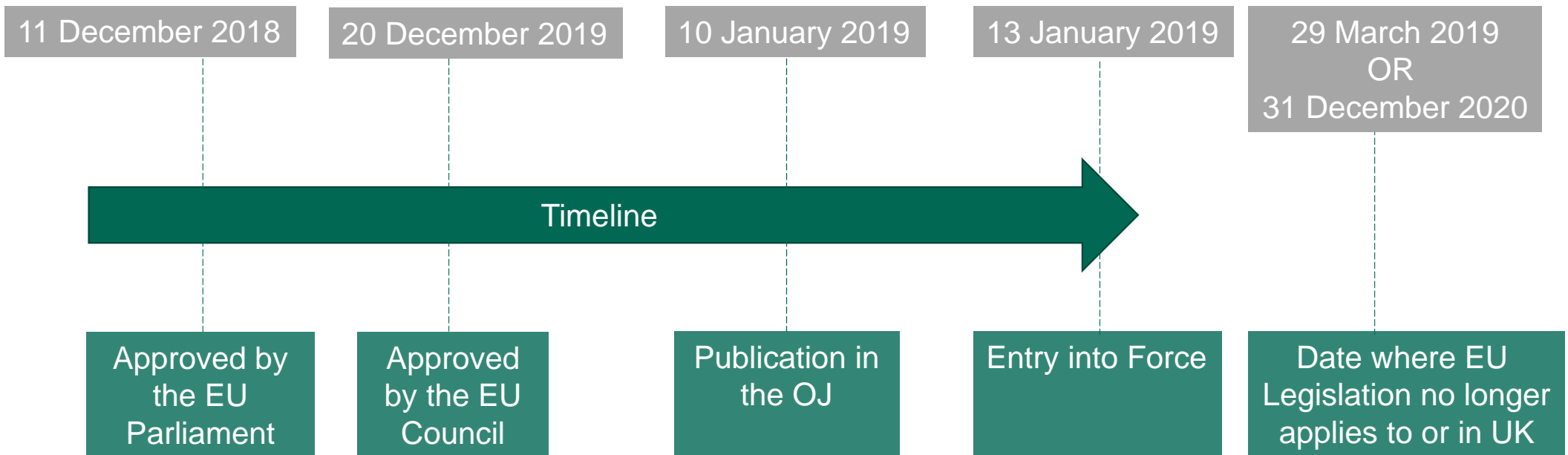


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Timeline of the EU Regulation Publication

Mike Protheroe

Regulation (EU) 2019/26 of the European Parliament and of the Council of 8 January 2019 complementing Union type-approval legislation with regard to the withdrawal of the United Kingdom from the Union



Regulation (EU) 2019/26: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.LI.2019.008.01.0001.01.ENG&toc=OJ:L:2019:008I:TOC>



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VCA's Technical Service Status for STA and RDW

Mike Protheroe

VCA's Technical Service Status for STA and RDW

- ▶ VCA have designation as EU and UNECE Technical Service with;

	Country	TAA	TS Granted on
e5 / E5	Sweden	STA	5 February 2018
e4 / E4	Netherlands	RDW	27 July 2018

- ▶ VCA aims to maintain these designations in accordance with EU requirements.



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VCA's Preparations for a 'No Deal' Scenario

Mike Protheroe

VCA's Preparation for a 'No Deal' Scenario

- ▶ We understand that the EU Regulation doesn't address anything that may influence the future relationship that the UK will have with the EU.

- ▶ VCA's preparation for a no deal scenario is in two strands:
 - 1) The e11 Conversion Process (via EU Regulation 2019/26)
 - 2) The introduction of a UK National Scheme



How many type approvals could be affected?

▶ Worst Case

- ▶ VCA anticipate that approximately 37,000 systems approvals could need to be converted.
- ▶ VCA anticipate that 3,208 WVTA approvals could need to be converted.

- ▶ If the approval conversion process started in at the beginning of this week (week 3) there would be 11 weeks to convert all approvals before 29 March 2019. This equates to 55 working days.

- ▶ This equates to 672 S&C approvals per day
- ▶ This equates to 58 WVTA approvals per day



VCA's Preparation for a 'No Deal' Brexit

- ▶ VCA have taken on a number of administrators who are preparing approval packages to enable other member states to take on the 'e11' approvals that will expire on 29 March 2019 in the event of a no deal scenario.
- ▶ VCA will prepare the approval packages for these Type Approval Authorities requesting transfer. The package will consist of:
 - ▶ VCA Certificate (including all extensions).
 - ▶ VCA Test Reports referenced on the VCA Certificate. Cross referred VCA Test Reports (within test reports) are available on request.
 - ▶ Manufacturer's information document. Either a cover sheet or consolidated document.
 - ▶ COP Statement.



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Administration Process to Transfer Approvals

Dawn Crooks



Administration Process to Transfer Approvals

- ▶ Manufacturer sends completed REQUEST form (excel workbook) with Contact Details and List of Approvals to VCA via the UKTA mailbox.
- ▶ VCA will requests provisional numbers from the Approval Authority.
- ▶ VCA sends provisional numbers to the Manufacturer so they can prepare updated information documentation to accompany the new e4/e5 certificate.
- ▶ This must quote the new e4/e5 approval number and the previously issued e11 approval, date of issue and revision.
- ▶ Whole Vehicles will provide new Part III where applicable.
- ▶ VCA reviews the REQUEST form and raises any queries with manufacturer.
- ▶ VCA collates the approval history (approval certs from base to latest extension and test reports from latest extension) and drafts new e4/e5 certificates.
- ▶ Manufacturer returns updated info documentation to VCA.
- ▶ VCA collates information doc with draft e4/e5 cert and sends to approval authority for verification.



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Information Document Format

Dawn Crooks



Information Document Format

- ▶ Manufacturer's are proposing 2 forms of information document format, either:
 - 1) A single cover sheet

Or

 - 2) A consolidated information document

- ▶ The chosen option will depend on the preference of the issuing TAA of the Union Type Approval.



Information Document: Systems Approval

- ▶ A example of an S&C information document with the information contained on a cover sheet:

Diesel Engine Test

Regulation (EU) No. 582/2011 last amended by
Regulation (EU) No. 627/2014

ISB6.7E6C / ISD6.7E6C / PX-7 K1

e5*595/2009*627/2014C*1007*00
previously type approved and marked as
e11*595/2009*627/2014C*0443

On the certificate this information will displayed in the
remarks section:

Remarks (if any): None

Previously type-approved and marked as e11*595/2009*627/2014C*0442*04 on 22
August 2018 (including up to revision 04)



Information Document: Systems Approval

Consolidated Manufacturers information document

- ▶ In addition to the information on the cover sheet, the following information is reflected in a consolidated information document:

<u>Revisions</u>				
Extension	Job Number	Worst Case Number	Description of Work	Date Submitted
1	ESS371070	WC 169, WC 171, WC 172	New assembly plant and model names. Additional turbocharger, fuel pump and injector part numbers. Additional SC codes. Addition of 300H rating. Correction to 5.2.4 - speed at maximum torque.	09 September 2016
2	EST390266	WC 189	Addition of new fuel range compatibility	25 April 2017
3	EST426145	WC 206	Addition of new SC codes	17 July 2018
4	VEU449738	N/A	(5.2.4.2.9.3.9) Addition of EU Representative (0.9) and transfer current e11 type approvals from the UK to Sweden	10 January 2019

In the history page of the information document it will be stated that an EU Representative has been added (if applicable) and that the approval has been transferred from the UK to Sweden.



Addition of EU Representative in the System approval

- ▶ Typically OEMs are proposing to convert their e11 approval into a Union approval and at the same time add an EU Representative if this was originally based in the UK.
- ▶ Alternatively some OEM's are choosing to convert their e11 approval into a Union approval and then extend the Union approval to include their EU Representative.



WVTA Approval

e11 Conversion List

List of Union Type Approval numbers to be converted from e11, the approval issue date and the date the Union approval will take effect from is detailed here



List of type-approval certificates granted according to EU regulation ... 2019/26

VCA (UK) type-approval certificates	STA (Union) type –approval certificate of the same type	Approval date	Takes effect
e11*1003/2010*1003/2010*1002*04	e5*1003/2010*2015/166*0007*00	2019-01-18	2019-03-11
e11*1003/2010*2015/166*1001*04	e5*1003/2010*2015/166*0006*00	2019-01-18	2019-03-11
e11*1005/2010*1005/2010*1002*01	e5*1005/2010*1005/2010*0008*00	2019-01-18	2019-03-11
e11*1005/2010*1005/2010*1001*03	e5*1005/2010*1005/2010*0007*00	2019-01-18	2019-03-11

WVTA Information document Part III

Sample Part III document, detailing when the Union Approval will take effect from



Subject	Type approval number	Approval date yy-mm-dd	*Variant	*Versions
4A. Space for mounting and fixing rear registration plates	e11*1003/2010*2015/166*1002*04	17-05-17	All	All, until 2019-03-10
	e5*1003/2010*2015/166*xxxx*00	19-01-18	All	All, as from 2019-03-11
...				
41A. Emissions (EURO VI) heavy-duty vehicles / access to information	e11*595/2009*627/2014C*0413*00	16-01-19	?P????	All, until 2019-03-10
	e5*595/2009*627/2014C*xxxx*00	19-01-18	?P????	All, as from 2019-03-11



WVTA Approval

- ▶ On the ECWVTA certificate there is no remarks sections, therefore if the ECWVTA is being converted to a Union Type Approval it is proposed that a note is added below the test results remark.

Additional note added to
the certificate

Test results (see Annex VIII).

Previously type-approved as e11*2007/46*3421*03 on 21/06/2018 (including up to revision 4)

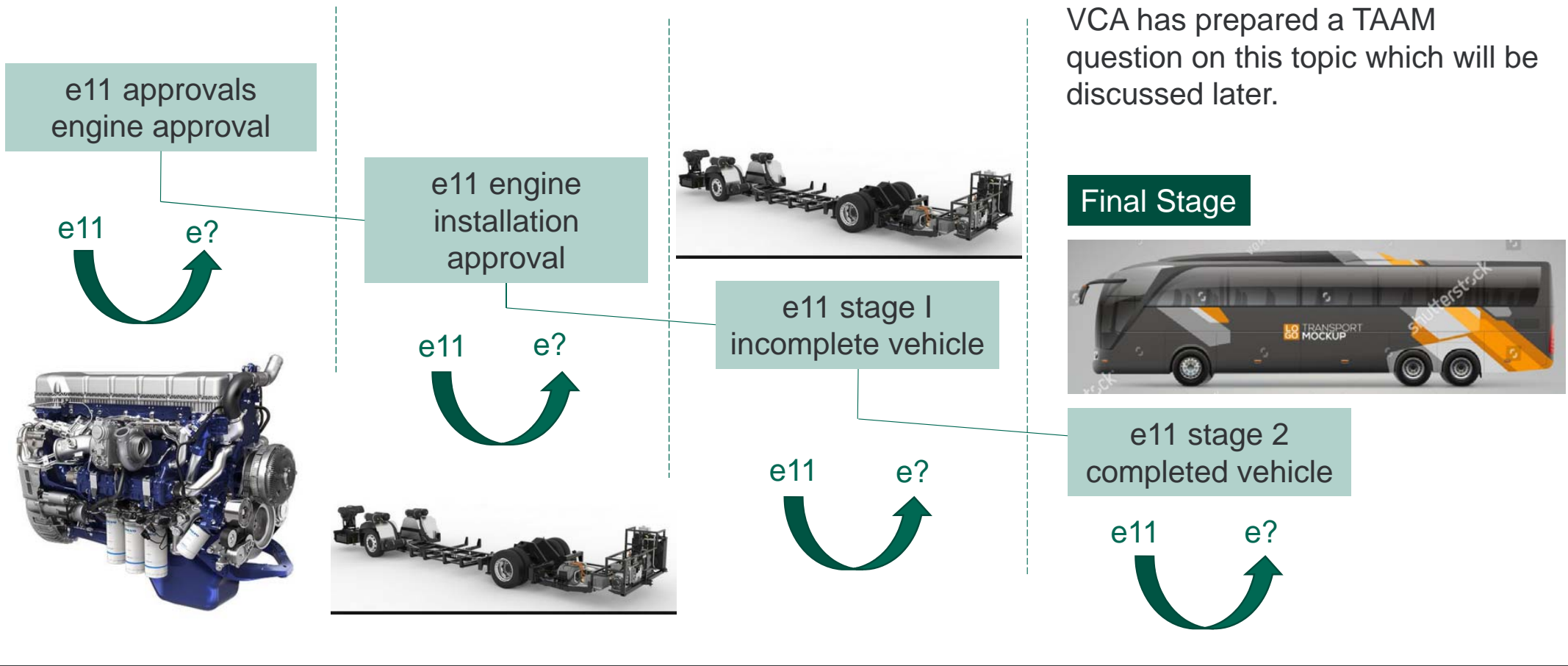
Name(s) and specimen(s) of the signature(s) of the person(s) authorised to sign certificates of conformity and a statement of their position in the company.

NB: If this model is used for type-approval pursuant to Articles 20, 22 or 23, it may not bear the heading, "EC Vehicle Type-Approval Certificate" except:

- in the case mentioned in Article 20 where the Commission has decided to allow a Member State to grant a type-approval in accordance with this Directive.
- In the case of vehicles of the category M1, type-approved according to the procedure prescribed in Article 22.



Complexity of Multi Stage Approvals



Questions?



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Conformity of Production

Stephen Trenoweth



Conformity of Production Compliance Statements

- ▶ VCA will supply a compliance statement to any Type Approval Authority converting an 'e11' approval to a Union Type Approval if requested.
- ▶ The content of the compliance statement matches what is required in 2007/46.
- ▶ TAA's can request compliance statements from VCA at the following email address copmailbox@vca.gov.uk
- ▶ In the request VCA would ask that the TAA state:
 - 1) The manufacturer's name and address
 - 2) The assembly plant the compliance statement is requested for




VCA CoP Compliance Statement


- ▶ Compliance Statement consists of a minimum of nine pages.
- ▶ Assembly sites, clearance dates and subjects covered listed.
- ▶ Indicates if subject covered is for component manufacture or vehicle installation.
- ▶ Each page is stamped with the VCA stamp.
- ▶ Separate statements for Motorcycle and Tractor.



Compliance Statement

- ▶ Side one lists manufacturer and key dates
- ▶ Can only be signed by certain VCA staff – list can be provided
- ▶ Statement duration may be curtailed due to increased risk mid term
- ▶ Areas in red are to remind auditors to select suitable answers and will be black on issued versions





e11

Conformity of Production Compliance Statement

VCA as the Type Approval Authority for the United Kingdom has conducted an assessment of the quality systems and the relevant control plans in order to verify Compliance with Annex X of EC Directive 2007/46 as last amended as well as Schedule 1 of Revision 3 of the E/CE/TRANS/505 Agreement done at Geneva on 20 March 1958 and the UK Road Vehicle (Approval) Regulations 2009 No. 717. The assessment was conducted in accordance with the requirements of this Directive and/or Regulation and Statutory Instrument

This Compliance Statement is issued to:

(Manufacturer name and address)

Assembly sites: See overleaf

Clearance Scope: See attachment

Vehicle Category/Component Range:

Registration Number: ECU**(office prefix eg MC/JP/CN/SE/NA)/CS/14**

Date of issue: [Click here to enter a date.](#)

Date of expiry: [Click here to enter a date.](#)


Signed for and on behalf of VCA

By authority of the Chief Executive

Planned date of monitoring visit: Choose an item.

- Validity of this Compliance Statement for the duration stated is dependent on ISO/IATF certificates being supplied before their expiry.
- On-site audit due prior to Compliance Statement expiry
- There may be additional surveillance visits carried out during the validation period

This Compliance Statement is issued by and is the property of the Vehicle Certification Agency
1 The Eastgate Office Centre, Eastgate Road, Bristol BS5 6XX, UK and is to be returned on formal request



Vehicle Certification Agency
11-Jan-19

CP-E-CL-10 Rev 04


VCA Compliance Statement

Page 1 of 9



Compliance Statement

- ▶ Side two lists assembly sites and EU representative (new version)
- ▶ As side 1, red areas will be black on issued version


Vehicle
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Agency

Assembly Plants:

Manufacturer's EU Representative:

Areas assessed:

Relevant processes and procedures required by mentioned legislation in following sheets and including:
EC Directive 2007/46 as last amended
Schedule 1 of Revision 3 of the E/CE/TRANS/505 1958
UK Road Vehicle (Approval) Regulations 2009 No. 717 Schedule 4, Part 2.
UK Road Vehicle (Approval) Regulations 2009 No. 717 Schedule 4, Part 3.
UK Road Vehicle (Approval) Regulations 2009 No. 717 Schedule 4 Part 4
UK Road Vehicle (Approval) Regulations 2009 No. 717 Schedule 5

Documents examined:

Relevant CoP documentation including
Quality Documents, ISO/IATF certificate(s), procedures and control plans


Vehicle Categories (if applicable): (M1 etc)

Other Member State approvals checked at time of audit: None

This Compliance Statement is issued by and is the property of the Vehicle Certification Agency
1 The Eastgate Office Centre, Eastgate Road, Bristol BS5 6XX, UK and is to be returned on request

COP-E-CL-10 Rev 04 VCA Compliance Statement Page 2 of 9

11-Jan-19





Compliance Statement

List of legislation covered by this compliance statement

Item	Subject	Dir (EC)	Reg (EU)	Reg (ECE)	Installation	Component
0	EC Type Approval (EWVTA)	2007 / 46			No	
0	EC Type Approval of Small Series (KS)	2007 / 46			No	
0	National Small Series Type Approval (NKS) Schedule 4, Part 2.	SI 2009 No. 717			No	
0	National Small Series Type Approval (NKS) Schedule 4, Part 3	SI 2009 No. 717			No	
0	National Small Series Type Approval (NKS) Schedule 4, Part 4	SI 2009 No. 717			No	
0	N1 Enhancement Scheme	2007 / 46			No	
0	N2 Enhancement Scheme	2007 / 46			No	
1	Permissible sound level	70/157			No	
1A	Sound level		540/2014	51	No	

If the subject is covered on the compliance statement this will be indicated with a 'Yes' in the relevant box or a 'No' if it is not covered.

List of legislation covered by this compliance statement

Item	Subject	Dir (EC)	Reg (EU)	Reg (ECE)	Installation	Component
0	EC Type Approval (EWVTA)	2007 / 46			No	
0	EC Type Approval of Small Series (KS)	2007 / 46			No	
0	National Small Series Type Approval (NKS) Schedule 4, Part 2.	SI 2009 No. 717			No	

2A	Emission vehicles					
3	Fuel tank					
3A	Prevention (tanks)					
3B	Rear underrun (RUPDs)					
4	Rear registration					
4A	Space for registration					
5	Steering					
5A	Steering					
6	Door latch					
6A	Vehicle (steps, r handhold)					
6B	Door latch component					
7	Audible signals					
7A	Audible signals					
8	Indirect					
8A	Devices installation					
9	Braking					
9A	Braking					
9B	Braking					
10	Radio interference					
10A	Electromagnetic					
11	Diesel Exhaust	72/60		24	No	
12	Interior fittings	74/60			No	
12A	Interior fittings		661/2009	21	No	
13	Anti-theft and immobiliser	74/61			No	

This certificate is issued by and is the property of the Vehicle Certification Agency, 1 The Eastgate Office Centre, Eastgate Road, Bristol BS5 6XX, UK and is to be returned on formal request.



Questions?



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UK National Scheme

Adrian Burrows



Preparations for a 'no deal' scenario

- ▶ EC type-approvals issued outside the UK will no longer be accepted for registering vehicles on the UK market.
- ▶ EC approvals issued in the UK will no longer be accepted for placing on the market in the EU.
- ▶ UNECE approvals will continue to be recognised.
- ▶ **Manufacturers will need to obtain a UK type-approval before their products can be registered in the UK.**

Guidance

Vehicle type approval if there's no Brexit deal

How vehicle and component manufacturers would be affected if the UK leaves the EU with no deal.

Published 13 September 2018
From: [Department for Transport](#)

Documents



[Vehicle type approval if there's no Brexit deal](#)

HTML

Details

If the UK leaves the EU in March 2019 without a deal, find out how this would affect manufacturers of vehicles and vehicle components seeking vehicle type approval.

<https://www.gov.uk/government/publications/vehicle-type-approval-if-theres-no-brexit-deal>



Summary of UK No-Deal approval scheme

Stage 1 – Approvals required to place on UK market or, where necessary, to register vehicles

Category	Built before exit*		Built after exit*
	In the UK before exit	Outside UK before exit	
M	EU approval	Provisional UK approval	Provisional UK approval
N	EU approval	Provisional UK approval	Provisional UK approval
O	EU approval	EU approval or Provisional UK approval	EU approval or Provisional UK approval
L	EU approval	Provisional UK approval	Provisional UK approval
T	EU approval	Provisional UK approval	Provisional UK approval
NRMM	EU approval	EU approval or Provisional UK approval	EU approval or Provisional UK approval
Other Components	EU approval	EU approval	EU approval

* No action required if national approval, IVA or valid e11 approval in place on exit

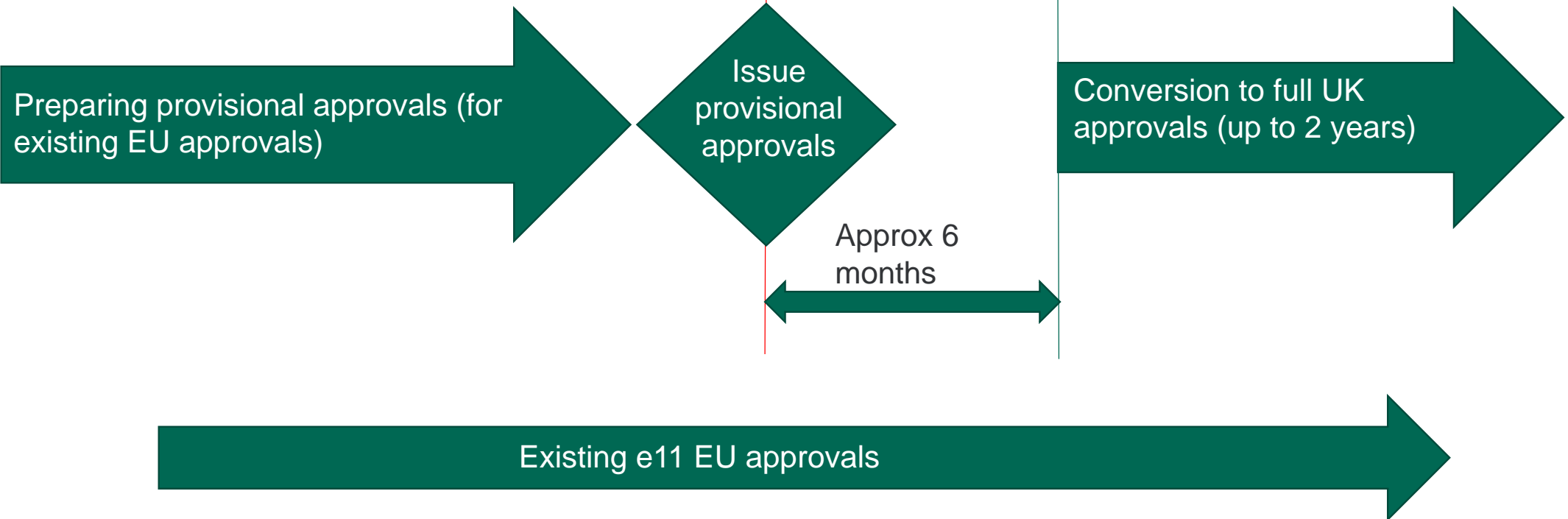


Existing EU approvals 'no deal' contingency timeline

1st stage - winter 2018

29th March 2019

2nd stage - summer 2019





Existing EU approvals - Registration

29th March 2019

Products built before Exit day (provided in UK before Exit)

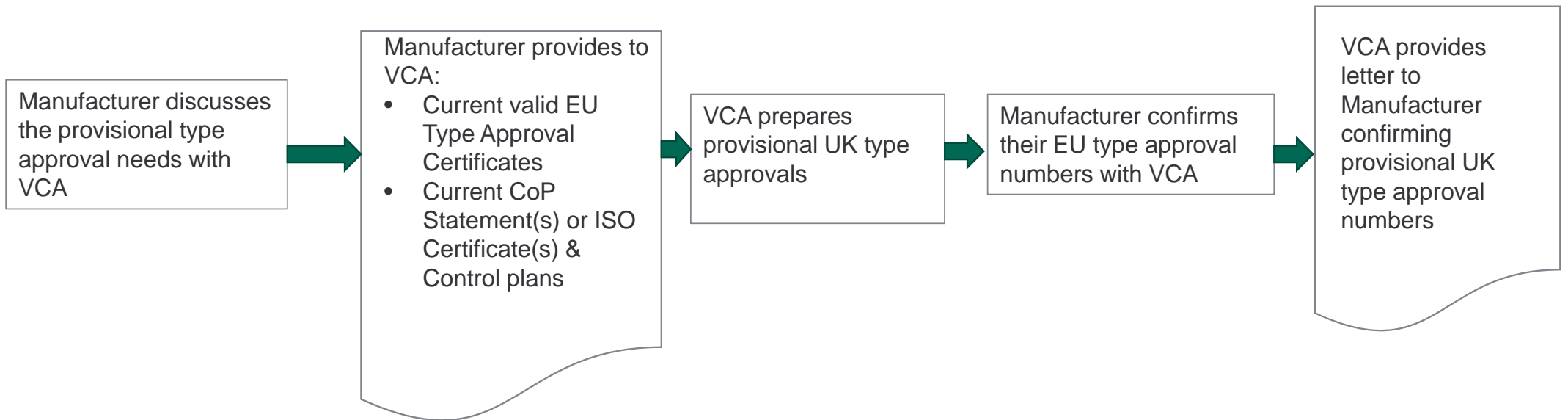
Registration on the basis of existing EU approval and CoC

Products built before but not in UK at Exit and products built on or after Exit day

- Registration on the basis of Provisional or Full UK approval.
- EU CoC equivalent to UK CoC (for 2 years)



Existing EU Approvals 1st Stage Provisional Approvals





Existing EU Approvals 1st Stage Provisional Approvals

- ▶ VCA will issue a corresponding UK approval number for each ECWVTA.

e1*2007/46*2349*00 → p1*2007/46*2349*00

- ▶ Provisional approvals are valid for up to 2 years from date of issue.
- ▶ Manufacturers must notify VCA of extensions to the original EU approvals which must also be valid on Exit day.
- ▶ Provisional approvals must be converted in to full UK approvals (2nd stage) or will lapse after 2 years.
- ▶ VCA retain the right to request further documentation or carry out physical inspections.



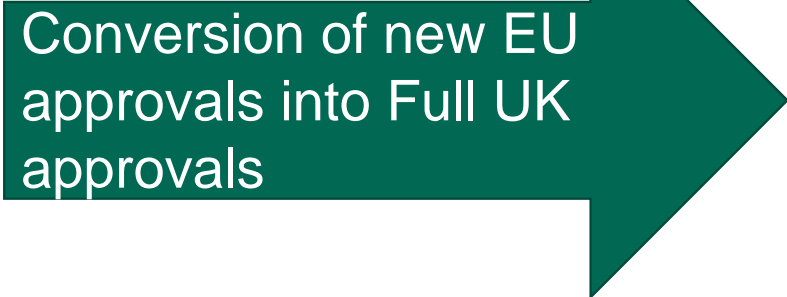
New EU approvals issued after 29th March

29th March
2019

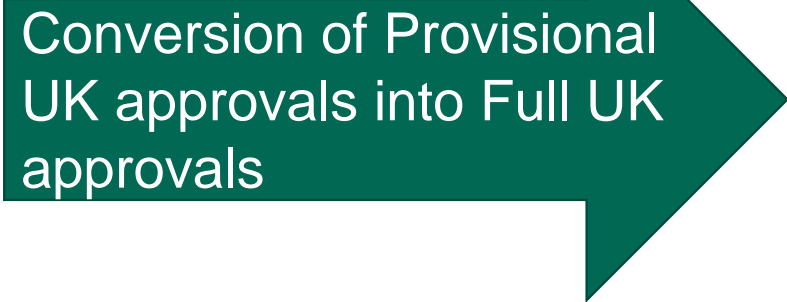


Conversion of new EU
approvals into Provisional UK
approvals

Summer 2019



Conversion of new EU
approvals into Full UK
approvals



Conversion of Provisional
UK approvals into Full UK
approvals



CoC's and Markings

Health Warning! Requirements on CoC's and Markings will be contained in the future legislation. This information illustrates a possible scenario for consideration but is not Government policy at this time.

29th March
2019

Summer
2019

[29th March
2021]

EU CoC accepted as equivalent to a UK CoC provided a Provisional or Full UK approval is in place

Format for UK CoC available for Full Approvals (use optional)

UK CoC must be used for Full Approvals*

*Possible extension (approx. 3 months) for provisional approvals issued after Exit

Items in **Orange** subject to introduction of further legislation



National Schemes

- ▶ Individual Vehicle Approval – No Change
- ▶ National Small Series Approval – temporary 2x increase to limits until 31st December 2019

	Current limits	Temporary limits
M1	100	200
M2 & M3	250	500
N1	250	500
N2 & N3	250	500
O1 & O2	500	1000
O3 & O4	250	500

Next steps

Contact VCA to discuss your approval needs:

- ▶ UKTA@vca.gov.uk

Further Guidance is available at:

- ▶ <https://www.vehicle-certification-agency.gov.uk///eu-exit/eu-exit.asp>

Questions?



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EU Regulation 2019/26

Mike Protheroe and Paul Rothwell

Article 2 of the EU Conversion Regulation; Scope

Article 2

Scope

1. This Regulation shall apply to vehicles, systems, components and separate technical units which fall within the scope of Directive 2007/46/EC, Regulation (EU) No 167/2013, Regulation (EU) No 168/2013 or Regulation (EU) 2016/1628 and their types which have been approved by the UK type-approval authority on the basis of those acts or any regulatory act of the Union listed in Annex IV to Directive 2007/46/EC or any regulatory act repealed by those regulatory acts of the Union.
2. References to separate technical units under this Regulation shall be understood as covering references to engines under Regulation (EU) 2016/1628.

- ▶ Applies to EU/ECWVTA only, not UN-ECE

Article 3 of the EU Conversion Regulation

Article 3

Definitions

For the purposes of this Regulation, the following definitions apply:

- (1) 'Union type-approval authority' means a type-approval authority of a Member State other than the United Kingdom;
- (2) 'UK type-approval' means an EC type-approval or EU type-approval granted by the UK type-approval authority;
- (3) 'Union type-approval' means an EU type-approval granted by a Union type-approval authority in accordance with this Regulation.

Article 4 of the EU Conversion Regulation: Application for Union type approval

Article 4

Application for a Union type-approval

1. By way of derogation from Article 6(6) and Article 7(1) of Directive 2007/46/EC, Article 21(2) of Regulation (EU) No 167/2013, Article 26(2) of Regulation (EU) No 168/2013 and Article 20(1) of Regulation (EU) 2016/1628, a manufacturer holding a UK type-approval that has not become invalid pursuant to Article 17 of Directive 2007/46/EC, Article 32 of Regulation (EU) No 167/2013, Article 37 of Regulation (EU) No 168/2013 or Article 30 of Regulation (EU) 2016/1628 may, until the Union type-approval legislation referred to in Article 2(1) of this Regulation ceases to apply to and in the United Kingdom, submit an application to a Union type-approval authority for a Union type-approval of the same type.
2. In order to be approved, the type must comply with the requirements for the placing on the market, registration or entry into service of new vehicles, systems, components or separate technical units applicable at the time when the Union type-approval takes effect.

- ▶ Puts in place derogation from type approval rule that manufacturers cannot move approvals to another authority.
- ▶ Places obligation on manufacturers to pay fees and provide information to approval authority.



Article 4 of EU Regulation 2019/26: Application for Union type approval

3. By submitting the application pursuant to paragraph 1, the manufacturer shall be liable to pay adequate fees, laid down by the Union type-approval authority, for any costs resulting from the exercise of the powers and the fulfilment of the obligations of the Union type-approval authority in relation to the Union type-approval.

4. When submitting the application pursuant to paragraph 1 of this Article, the manufacturer shall, at the request of the Union type-approval authority, submit any documentation and information that the authority deems necessary in order to decide whether to grant a Union type-approval in accordance with Article 5.

The documentation and information referred to in the first subparagraph may include the original UK type-approval including all amendments, the information folder and the test reports. In the case of vehicles, such a request may also include any EC type-approval, EU type-approval or UN type-approval and its attachments, as part of the whole vehicle type-approval.



Questions relating to **Article 4**

Question Number	Questioned raised by	Subject
Article 4(a)	UK	Approval Authorities engaged in discussion with OEM's to issue Union approvals and the capacity of other member states to issue these type approvals
Article 4 (b)	UK	Acceptance of provisional number list for ECWVTA

Article 5 of EU Regulation 2019/26; conditions for the granting of a Union type approval and its effects

Article 5

Conditions for the granting of a Union type-approval and its effects

1. By way of derogation from Article 8(2), Article 9(1) and Article 10(1) and (2) of Directive 2007/46/EC, Article 6(2) of Regulation (EU) No 167/2013, Article 7(2) and Article 18 of Regulation (EU) No 168/2013 and Article 6(2) of Regulation (EU) 2016/1628, the Union type-approval authority which has received an application in accordance with Article 4 of this Regulation may grant a Union type-approval with respect to a vehicle, system, component or separate technical unit if the type in question meets, at the time when the Union type-approval takes effect, the requirements applicable for the placing on the market, registration or entry into service of new vehicles, systems, components or separate technical units.

2. Insofar as no new requirements are applicable and without prejudice to paragraph 3 of this Article, the Union type-approval may be granted on the basis of the same test reports which were previously used for the granting of the UK type-approval in accordance with the applicable provisions, regardless of whether the technical service that issued the test report has been designated and notified by the Member State granting the Union type-approval in accordance with Directive 2007/46/EC, Regulation (EU) No 167/2013, Regulation (EU) No 168/2013 or Regulation (EU) 2016/1628, and even after the Union type-approval legislation referred to in Article 2(1) of this Regulation ceases to apply to and in the United Kingdom.

- ▶ Creates derogation to allow “transfer” of existing approval.
- ▶ Allows original test reports to be used by approval authority.

Article 5 of EU Regulation 2019/26; conditions for the granting of a Union type approval and its effects

3. Before granting a Union type-approval, the Union type-approval authority may request the repetition of specific tests. In that case, those tests shall be carried out by a technical service which has been designated and notified by the Member State of the Union type-approval authority in accordance with Directive 2007/46/EC, Regulation (EU) No 167/2013, Regulation (EU) No 168/2013 or Regulation (EU) 2016/1628.

4. The type approved in accordance with paragraph 1 of this Article shall receive an EU type-approval certificate with a number consisting of the distinguishing number of the Member State whose type-approval authority granted the Union type-approval and of the number of the applicable act referred to in Article 2(1). It shall also include the number of the latest amending act containing requirements for type-approval in accordance with which the Union type-approval is granted. For vehicles, the type-approval certificate and the certificate of conformity shall, under 'Remarks:', contain the mention 'Previously type-approved as' and refer to the number and the date of the EU type-approval certificate received following the UK type-approval. For systems, components or separate technical units, the type-approval certificate shall contain the mention 'Previously type-approved and marked as' and refer to the type-approval mark received following the UK type-approval.

5. The Union type-approval shall take effect on the day of its granting or on a later date determined therein. The UK type-approval shall become invalid on the day preceding the day on which the Union type-approval takes effect. In any event, it shall become invalid at the latest on the day on which the Union type-approval legislation referred to in Article 2(1) ceases to apply to and in the United Kingdom.

- ▶ Allows repeat testing by approval authority.
- ▶ New approval certificates to include original approval number.
- ▶ New approval can take effect immediately or be post-dated.

Article 5 of EU Regulation 2019/26; conditions for the granting of a Union type approval and its effects

6. A Union type-approval shall be considered to be an EC type-approval or an EU type-approval within the meaning of Directive 2007/46/EC or any act listed in Annex IV to that Directive, Regulation (EU) No 167/2013, Regulation (EU) No 168/2013 or Regulation (EU) 2016/1628. All provisions of those acts not derogated from in this Regulation shall continue to apply. The Union type-approval authority shall take full responsibility for the obligations stemming from the Union type-approval.

The Union type-approval authority shall also, from the time when the Union type-approval takes effect, exercise all the powers and fulfil all the obligations of the UK type-approval authority with respect to the following:

- (a) vehicles, systems, components or separate technical units produced on the basis of the UK type-approval already placed on the market, registered or entered into service in the Union;
- (b) vehicles, systems, components or separate technical units produced on the basis of the UK type-approval to be placed on the market, registered or entered into service in the Union in accordance with the third subparagraph.

Vehicles, systems, components or separate technical units produced on the basis of a UK type-approval which has become invalid as a result of the granting of a Union type-approval may be placed on the market, registered and entered into service in the Union until the Union type-approval legislation referred to in Article 2(1) of this Regulation ceases to apply to and in the United Kingdom or, where the Union type-approval becomes invalid before that date pursuant to Article 17 of Directive 2007/46/EC, Article 32 of Regulation (EU) No 167/2013, Article 37 of Regulation (EU) No 168/2013 or Article 30 of Regulation (EU) 2016/1628, until the date on which the Union type-approval becomes invalid. For vehicles, manufacturers shall indicate the Union type-approval number in a supplement to the certificate of conformity before such vehicles are placed on the market, registered or entered into service in the Union.

The Union type-approval authority shall not be liable for any acts or omissions of the UK type-approval authority.

Article 5 of EU Regulation 2019/26; conditions for the granting of a Union type approval and its effects

- ▶ All other requirements of the frameworks apply and new approval authority take responsibility for existing and new production.
- ▶ Products made under the now invalid UK approval can continue to be placed on market etc until Brexit, and include new approval number using a supplement to the CoC when doing so.
- ▶ New approval authority not liable for omissions of VCA.



Questions relating to **Article 5**

Question Number	Questioned raised by	Subject
Article 5 Q(a)	UK	Acceptance of VCA ECO innovations reports and codes
Article 5 Q(b)	UK	Complexity of Multi stage approvals
Article 5 Q(c)	UK	Placing on the market

Article 6 of EU Regulation 2019/26; Union type approval authority responsible for vehicles, systems, components or separate technical units of types not approved under this Regulation

Article 6

Union type-approval authority responsible for vehicles, systems, components or separate technical units of types not approved under this Regulation

1. When applying for a Union type-approval under Article 4, a manufacturer shall also request the Union type-approval authority in question to take over the obligations of the UK type-approval authority with respect to the manufacturer's other vehicles, systems, components or separate technical units placed on the market, registered or entered into service in the Union on the basis of UK type-approvals that have either become invalid pursuant to Article 17 of Directive 2007/46/EC, Article 32 of Regulation (EU) No 167/2013, Article 37 of Regulation (EU) No 168/2013 or Article 30 of Regulation (EU) 2016/1628, or for which no Union type-approval is sought under this Regulation.

Such request shall be made for all vehicles, systems, components and separate technical units based on UK type-approvals held by the manufacturer that were granted after 1 January 2008 unless the manufacturer presents proof to the Union type-approval authority that it has an agreement with another Union type-approval authority covering those vehicles, systems, components and separate technical units.

Article 6 of EU Regulation 2019/26; Union type approval authority responsible for vehicles, systems, components or separate technical units of types not approved under this Regulation

- ▶ When applying for “transfer” of existing approvals manufacturers must request the transfer of legacy approvals as well.
- ▶ Authority can only “transfer” existing approvals if accept legacy as well, but no obligation on authority to accept “transfer” of new approvals.
- ▶ As above, approval authority has usual powers/obligations with respect to legacy approvals, and not liable for VCA’s omissions.



Article 6 of EU Regulation 2019/26; Union type approval authority responsible for vehicles, systems, components or separate technical units of types not approved under this Regulation

2. The Union type-approval authority may only grant a Union type-approval in accordance with Article 5 after it has accepted the request made pursuant to paragraph 1 of this Article and after the manufacturer has agreed to cover the costs that the Union type-approval authority incur as a result of exercising its powers and fulfilling its obligations in respect of the vehicles, systems, components and separate technical units concerned.
3. After accepting the request referred to in paragraph 1 of this Article and granting the Union type-approval in accordance with Article 5, the Union type-approval authority shall exercise all the powers and fulfil all the obligations of the UK type-approval authority with respect to all vehicles, systems, components or separate technical units produced on the basis of the UK type-approvals referred to in paragraph 1 of this Article regarding recalls, repair and maintenance information and in-service conformity checks. The Union type-approval authority shall not be liable for any acts or omissions of the UK type-approval authority.
4. The Union type-approval authority shall inform the type-approval authorities of the other Member States and the Commission of the types for which it has taken over the obligations of the UK type-approval authority in accordance with paragraph 1.



Questions relating to **Article 6**

Question Number	Questioned raised by	Subject
Article 6 Q(a)	UK	Notification upon Granting of Union Type Approvals
Article 6 Q(b)	UK	Union Type Approval Authorities Acceptance of e11 Legacy approvals
Article 6 Q(c)	UK	Conversion of approvals first granted prior to 1 st January 2008



Article 7 of EU Regulation 2019/26; Specific provisions

Article 7

Specific provisions

This Regulation shall not preclude the placing on the market, making available on the market, registration or entry into service of engines, or of vehicles and non-road mobile machinery in which such engines are installed, that conform to a type whose UK type-approval has become invalid while the Union type-approval legislation referred to in Article 2(1) of this Regulation still applies to and in the United Kingdom, in accordance with Article 10(7) of Directive 97/68/EC, Article 34(7) and (8) or Article 58(5) to (11) of Regulation (EU) 2016/1628 and acts adopted on the basis of Article 19(6), Article 20(8), Article 28(6) and Article 53(12) of Regulation (EU) No 167/2013.

- ▶ Re-states the (complicated) exemptions for replacement engines for NRMM.



Questions relating to **Article 7**

Question Number	Questioned raised by	Subject
Article 7 Q(a)	UK	NRMM

Article 8 of EU Regulation 2019/26; Entry into force and application

Article 8

Entry into force and application

This Regulation shall enter into force on the third 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, 8 January 2019.

For the European Parliament

The President

A. TAJANI

For the Council

The President

G. CIAMBA



Vehicle
Certification
Agency

Additional Questions



Additional Questions

Question Number	Questioned raised by	Subject
AOB Q(a)	UK	European Small Series Type Approval certificates (sequential numbers)
AOB Q(b)	UK	UNECE Approvals



Vehicle
Certification
Agency

Any Other Business



Any Other Business

- ▶ VCA would like to continue to have access to ETAES. ETAES is a critical tool to support its market surveillance activities.
- ▶ The UK has enjoyed the close cooperation with other member states over many years. Therefore the UK would like to carry on attending TAAM and contributing towards future meetings.

Additional question 1 raised by Romania:

Scenario: A vehicle is placed on the market after 29 March 2019. However, the vehicle already has already been granted an End of Series (EoS) derogation by a member state. Does the vehicle require a Union approval?

TAAM Members comments:

UK: this item is covered in recital 19.

Austria: Recital 19 is not linked to an article number.

Germany: EoS exemption is still valid. A union approval is not possible (because technically the approval is invalid – this is why EoS has been granted).

General opinion of TAAM members: if EoS has been granted prior to 29 March this remains valid. EoS is not applicable for vehicles that lose their validity due to the United Kingdoms exit from the EU.

Additional question 2 raised by Romania:

EoS is calculated on percentages in some cases. Should this calculation be made on:

- 1) The e11 approval
- 2) The Union approval
- 3) Both the e11 and the Union approval?

General opinion of TAAM members: Option 3. The reason being that EoS is granted on the basis of the vehicle type. When a union approval has been granted this is not a new type.

Agenda Item 2: TAAM Questions

TAAM - United Kingdom 2019

Regulation or Directive Number: EU Regulation 2019/26

Subject: Member States making use of the provisions of the regulation to issue Union approvals

Legislation

Article 4

Discussion

If type approval authorities have agreed to convert e11 approvals to Union type approvals it would be useful for VCA to understand which approval authorities are working with which manufacturers. This will support VCA's record keeping. VCA anticipate that up to 37,000 systems approvals and 3,200 WVTA approvals could be required to be converted.

Questions

Question 1

Which member states have been asked by OEM's to issue Union type approvals that were originally e11 approvals and have accepted that request from the OEM? Can these member states also give an indication of which OEM's they are working with?

Question 2

Are there any member states which are not willing to convert e11 approvals into a Union Type Approval if requested by an OEM?

Question 3

For the type approval authorities that answered 'Yes' (*will convert approvals*) to question 1, do these type approval authorities have sufficient capacity to issue the required type approvals prior to 29 March 2019? OEM's are very keen to understand if this task is achievable.

Suggested Answers

Question 1

Answer		a) Yes <i>(And details of OEM's)</i>	b) No <i>Have not been asked by OEM's</i>
Type approving authority "e"			
e1	Germany		X
e2	France	Not attending	Not attending
e3	Italy	Not attending	Not attending
e4	Netherlands	X	
e5	Sweden	X <i>(In discussion with 3 OEM's)</i>	
e6	Belgium	Not attending	Not attending
e7	Hungary	Not attending	Not attending
e8	Czech Republic	Not attending	Not attending
e9	Spain	X <i>Requests in Nov/Dec (Volvo Trucks)</i>	
e11	UK	-	-
e12	Austria		X
e13	Luxembourg		X <i>But will inform VCA if this changes</i>
e17	Finland		X <i>But will inform VCA if this changes</i>
e18	Denmark	Not attending	Not attending
e19	Romania		X <i>But will inform VCA if this changes</i>
e20	Poland		X
e21	Portugal	Not attending	Not attending
e23	Greece	Not attending	Not attending
e24	Ireland	X <i>(Provisionally Yes but will confirm with ministry. 1 enquiry from Irish component manufacturer but no OEM)</i>	
e26	Slovenia	Not attending	Not attending
e27	Slovakia		X
e29	Estonia		X

e32	Latvia	Not attending	Not attending
e34	Bulgaria	Not attending	Not attending
e36	Lithuania	Not attending	Not attending
e49	Cyprus	Not attending	Not attending
e50	Malta	Not attending	Not attending
	Iceland	-	-
	Norway	Not attending	Not attending

Additional comments to question 1:	
Netherlands: will request Test reports directly from VCA.	

Question 2

Answer		a) <i>will not</i> convert e11 approvals	b) <i>will</i> convert e11 approvals
Type approving authority "e"			
e1	Germany		X <i>Nb. Capacity concerns, which TS so case by case</i>
e2	France	Not attending	Not attending
e3	Italy	Not attending	Not attending
e4	Netherlands		X <i>If tech service is accredited by RDW</i>
e5	Sweden		X
e6	Belgium	Not attending	Not attending
e7	Hungary	Not attending	Not attending
e8	Czech Republic	Not attending	Not attending
e9	Spain		X <i>Depends on OEM and capacity</i>
e11	UK	-	-
e12	Austria		X <i>However, no capacity</i>
e13	Luxembourg		X <i>recently added some resources but would depend on the amount</i>
e17	Finland		X <i>Capacity for Finnish OEMS only</i>
e18	Denmark	Not attending	Not attending
e19	Romania		X <i>But capacity limited</i>
e20	Poland		X <i>But capacity limited</i>
e21	Portugal	Not attending	Not attending
e23	Greece	Not attending	Not attending
e24	Ireland		X <i>(Irish OEM's will be priority)</i>
e26	Slovenia	Not attending	Not attending
e27	Slovakia		X <i>No capacity</i>
e29	Estonia		X <i>No capacity</i>
e32	Latvia	Not attending	Not attending
e34	Bulgaria	Not attending	Not attending
e36	Lithuania	Not attending	Not attending

e49	Cyprus	Not attending	Not attending
e50	Malta	Not attending	Not attending
	Iceland	-	-
	Norway	Not attending	Not attending

Additional comments to question 2:

All agreed.

RDW: If tech service is not assigned to RDW then they may refuse the application. This is an internal decision from RDW.

Austria: In principle Austria would, however, they do not have the capacity to issue type approvals.

Ireland: There are resource issues. Need to consult with the Irish Ministry to see their motivation.

Germany: In principle Germany will issue new type approvals. However, capacity issues. Documents may be requested from UK authority.

Romania: capacity an issue. Suggest VCA could prepare the information for the authority?

Finland: It is possible for Finland to take on the capacity for Finnish type approvals.

Question 3

Answer		a) Yes <i>Have capacity to issue Union approvals</i>	b) No <i>Do not have capacity</i>
Type approving authority "e"			
e1	Germany	X <i>(some capacity)</i>	
e2	France	Not attending	Not attending
e3	Italy	Not attending	Not attending
e4	Netherlands	X <i>(some capacity)</i>	
e5	Sweden	X	
e6	Belgium	Not attending	Not attending
e7	Hungary	Not attending	Not attending
e8	Czech Republic	Not attending	Not attending
e9	Spain	X <i>(it depends on the OEM. It is possible to do some)</i>	
e11	UK	-	-
e12	Austria		X <i>(only 4 people in TAA)</i>
e13	Luxembourg	X <i>(recently added some resources but would depend on the amount of approvals)</i>	
e17	Finland		X <i>(Limited - Finnish OEMS)</i>
e18	Denmark	Not attending	Not attending
e19	Romania		X <i>(Limited)</i>
e20	Poland		X <i>(Limited resource)</i>
e21	Portugal	Not attending	Not attending
e23	Greece	Not attending	Not attending
e24	Ireland		X <i>(Irish OEM's will be priority)</i>
e26	Slovenia	Not attending	Not attending
e27	Slovakia		X
e29	Estonia		X
e32	Latvia	Not attending	Not attending
e34	Bulgaria	Not attending	Not attending
e36	Lithuania	Not attending	Not attending

e49	Cyprus	Not attending	Not attending
e50	Malta	Not attending	Not attending
	Iceland	-	-
	Norway	Not attending	Not attending

Additional comments to question 3

Spain: it depends on the quantity of type approvals. A decision between the technical service and the authority in Spain.

Netherland: difficult to judge the quantity of approvals. Relying on VCA to prepare the packages.

TAAM - United Kingdom 2019

Regulation or Directive Number: EU Regulation 2019/26

Subject: -

Legislation

Article 4

Discussion

VCA and manufacturer's understand there is little time to convert all existing e11 approvals into Union Type Approvals prior to 29 March 2019. Therefore it would be useful to understand if other Type Approval Authorities would accept an alternative to having the actual S&C approval before inclusion in a WVTA.

Questions

Can Type Approval Authorities accept provisional numbers for Systems & Components approvals for inclusion in an ECWVTA? (The S&C will be transferred from e11, so there is no technical concern).

Details of proposal:

The proposal is that OEM's list the approvals to be converted from an e11 into a Union Type Approval. The OEM also requests the approval issue date and the date the approval takes effect from. Once agreed with the relevant TAA and the document is populated with type approval numbers assigned to that Union approval the document could be stamped by the relevant Type Approval Authority and accompanied by a letter.

Detail of approvals to be converted:

WVTA:	Existing e11	Updated e11 to meet 19w11 scope	Transfer to be e5	Issue Date	Date approval takes effect from
4x2 Rigid	e11*2007/46*3087*12	e11*2007/46*3087*13			
4x2 Tractor	e11*2007/46*3086*12	e11*2007/46*3086*13			
6x2P Tractor	e11*2007/46*3261*11	e11*2007/46*3261*12			
6x2T Tractor	e11*2007/46*3262*11	e11*2007/46*3262*12			
6x2T Rigid	e11*2007/46*3263*11	e11*2007/46*3263*12			
6x2T Swapbody Rigid	e11*2007/46*3446*11	e11*2007/46*3446*12			
8x2F Rigid	e11*2007/46*3264*11	e11*2007/46*3264*12			
8x4P Tractor	e11*2007/46*3445*11	e11*2007/46*3445*12			
8x4P Rigid	e11*2007/46*3266*11	e11*2007/46*3266*12			
8x4T Rigid	e11*2007/46*3088*12	e11*2007/46*3088*13			
8x2PT Rigid	e11*2007/46*3265*11	e11*2007/46*3265*12			
Completed WVTA 4x2	e11*2007/46*0008*19	e11*2007/46*0008*20			
Completed WVTA 6x2	e11*2007/46*0002*19	e11*2007/46*0002*20			
Completed WVTA Artic	e11*2007/46*0009*19	e11*2007/46*0009*20			

The approval issue date:

Suggested that this is communicated in the normal way:

7. Date: **issue date**

8. Signature:

D LAWLOR
Chief Technical and Statutory Operations Officer

Date the approval takes effect from:

This could be added to the remarks section of the type approval certificate:

3.4 Manufacturer's certificate on access to vehicle repair and maintenance information provided:

4. Remarks: **date approval takes effect from**

Suggested Answers

Answer		a) Yes	b) No
Consensus of TAAM members		<i>Clarification during the meeting that the approval list is not 'provisional'; this is an authenticated list by the issuing Union TAA. Some TAA's agree that it is permitted for systems and component approvals to follow. Some TAA's require copies of actual approval documentation prior to inclusion in ECWVTA.</i>	
Type approving authority "e"			
e1	Germany	X	
e2	France	Not attending	Not attending
e3	Italy	Not attending	Not attending
e4	Netherlands		X
e5	Sweden	X	
e6	Belgium	Not attending	Not attending
e7	Hungary	Not attending	Not attending
e8	Czech Republic	Not attending	Not attending
e9	Spain		X
e11	UK	-	-
e12	Austria	X	
e13	Luxembourg	X <i>(but need to confirm with the Lux ministry)</i>	
e17	Finland		
e18	Denmark	Not attending	Not attending
e19	Romania		
e20	Poland		
e21	Portugal	Not attending	Not attending
e23	Greece	Not attending	Not attending
e24	Ireland		X
e26	Slovenia	Not attending	Not attending
e27	Slovakia		
e29	Estonia		X
e32	Latvia	Not attending	Not attending
e34	Bulgaria	Not attending	Not attending
e36	Lithuania	Not attending	Not attending
e49	Cyprus	Not attending	Not attending
e50	Malta	Not attending	Not attending

	Iceland	-	-
	Norway	Not attending	Not attending

Additional comments to question 1

Sweden: One document package covering transferred TAA and legacy approvals. Then the certificates will follow later on (20 days).

Netherlands: This should be done all at the same time. S&C and WVTA keep the same approval date (recommendation). RDW can only issue WVTA when S&C approvals are available (physically).

Luxembourg: had one request from an OEM to transfer 715/2007 'e11' approvals to e5 and for Luxembourg to accept in an ECWVTA – provisionally yes they will accept an authenticated list.

Additional question raised by the Netherlands:

Can Union approvals be granted to repealed directives?

Consensus of TAAM members: Yes, repealed directives that are eligible for placing a product on the market can be converted to a Union type approval.

UK: regarding Netherlands question on repealed directives this is covered in point 2 article 2. The UK believes that it is possible to issue type approvals to repealed directives.

Sweden: Have a similar remark to the UK. You can transfer approvals for only approvals that are valid for placing on the market. The fact the directive is repealed is not the main concern. Therefore if the product can be placed on the market with that particular approval it can be transferred.

UK: Article 2 and Article 4 need to be read in conjunction. This does permit the issuing of repealed directives if they are valid for placing on the market.

RDW: checking at RDW and with contacts at the EU Commission. Definitely in favour of accepting.

Sweden: this regulation is here for taking out obstacles to OEM's for placing vehicles on the market.

Germany: from 1st reading agree that converting repealed directive is possible. However, there may be some issue with national legislation (special case for NR mobile machinery).

Ireland: can we reserve right to determine once feedback from RDW?

RDW: confirmed post meeting that repealed directives that are eligible for placing a product on the market can be converted to a Union type approval.



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THE UNITED KINGDOM VEHICLE APPROVAL AUTHORITY

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TAAM - United Kingdom 2019

Regulation or Directive Number: EU Regulation 2019/26

Subject: Use of VCA ECO Innovation Reports and Codes

Legislation

Article 5

Discussion

VCA has assessed products under the eco-innovations legislation and has received the eco-innovations code from the EU. In addition, we have tested LED lamps according to the generic eco-innovations Regulation and vehicle manufacturers are applying the e11 code in emissions and whole vehicle approvals in order to gain the CO2 savings.

In Annex 8 of the Whole Vehicle application, the code of the approval authority must be listed, along with the individual code:

4.1. *General code of the eco-innovation(s) ⁽¹⁾:*

Explanatory notes

^(h) Eco-innovations.

⁽¹⁾ ^(h8) The general code of the eco-innovation(s) shall consist of the following elements each separated by a blank space:

- Code of the approval authority as set out in Annex VII;
- Individual code of each eco-innovation fitted in the vehicle, indicated in chronological order of the Commission approval decisions.

(E.g. the general code of three eco-innovations approved chronologically as 10, 15 and 16 and fitted to a vehicle certified by the German type-approval authority should be: 'e1 10 15 16'.)

Questions

Question 1) Will these products still be allowed to use the eco-innovations reports issued by VCA after the UK leaves the EU and will vehicle manufacturers still be allowed to use e11 eco-innovation codes under the generic Regulation?

Question 2) If not, do the eco-innovation reports have to be re-submitted by a EU27 Authority?

Suggested Answers

Answer		Question 1		Question 2	
		a) Yes	b) No	c) Yes	d) No
Consensus of TAAM members		X		N/A	N/A
Type approving authority "e"					
e1	Germany				
e2	France	Not attending			
e3	Italy	Not attending			
e4	Netherlands				
e5	Sweden				
e6	Belgium	Not attending			
e7	Hungary	Not attending			
e8	Czech Republic	Not attending			
e9	Spain				
e11	UK	-	-	-	-
e12	Austria				
e13	Luxembourg				
e17	Finland				
e18	Denmark	Not attending			
e19	Romania				
e20	Poland				
e21	Portugal	Not attending			
e23	Greece	Not attending			
e24	Ireland				
e26	Slovenia	Not attending			
e27	Slovakia				
e29	Estonia				
e32	Latvia	Not attending			
e34	Bulgaria	Not attending			
e36	Lithuania	Not attending			
e49	Cyprus	Not attending			
e50	Malta	Not attending			
	Iceland				
	Norway	Not attending			

Additional comments:

Sweden: This is a commission decision, therefore these should not be considered. TAAEG made a similar decision regarding CO2MPAS data.

Ireland: agree also with Sweden. This is not an approval. A decision has been made by the Commission on this.

Netherlands: the e11 number can be kept because it has been approved by the EU Commission.

Germany: It is a pragmatic approach. It is an acceptable approach for Germany.

TAAM - United Kingdom 2019

Regulation or Directive Number: EU Regulation 2019/26

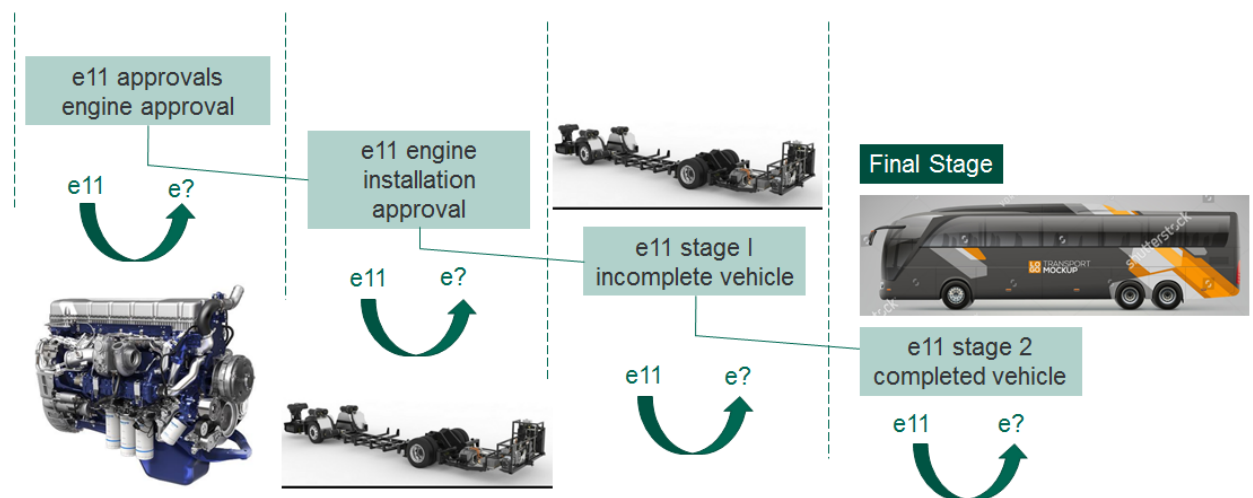
Subject: Multi-Stage approvals

Legislation

Article 5

Discussion

The final stage (completed) vehicle needs to be converted to a Union type approval. The image below shows the associated approvals within a typical bus and coach vehicle.



Questions

- 1) Can this final stage approval only take place once all of the previous associated e11 approvals have been converted?
- 2) How should this situation be treated in the scenario where the final vehicle is produced under a Union type approval after conversion from 'e11' but the 'bus chassis' is taken from stock and therefore the associated bus chassis approval is from a previous extension approval?

Suggested Answers

Question 1

Answer		a) Yes	b) No
Consensus of TAAM members		<i>Recommendation is to complete all at once; therefore the approvals do all need to be converted prior to final stage.</i>	
Type approving authority "e"			
e1	Germany	X (or a authenticated list is acceptable) and then certificates provided later	
e2	France	Not attending	Not attending
e3	Italy	Not attending	Not attending
e4	Netherlands	X	
e5	Sweden	X	
e6	Belgium	Not attending	Not attending
e7	Hungary	Not attending	Not attending
e8	Czech Republic	Not attending	Not attending
e9	Spain		
e11	UK	-	-
e12	Austria		
e13	Luxembourg		
e17	Finland		
e18	Denmark	Not attending	Not attending
e19	Romania		
e20	Poland		
e21	Portugal	Not attending	Not attending
e23	Greece	Not attending	Not attending
e24	Ireland	X	
e26	Slovenia	Not attending	Not attending
e27	Slovakia		
e29	Estonia		
e32	Latvia	Not attending	Not attending
e34	Bulgaria	Not attending	Not attending
e36	Lithuania	Not attending	Not attending
e49	Cyprus	Not attending	Not attending
e50	Malta	Not attending	Not attending

	Iceland		
	Norway	Not attending	Not attending

Additional comments to question 1:

Ireland: it is also there to help the approval authority granting the converted approval.

UK: this is a very real example. A separate question for the engine component and installation – does the engine approval need to be done first or can it be done at the same time?

Sweden: e11 engine marked prior to Brexit is ok.

Consensus of TAAM members: it is ok to do all approvals at the same time.

Sweden: 20 days notification (on ETAES) was reviewed. Member states would still be able to notify other member states and therefore registration authorities because the date is fixed and the notification of the approval can be made. We are discussing the following up of the approval documentation at a later date.

RDW: It is postponing the work, therefore should do it right at once. The paperwork should be done all at once.

UK: agree, there is a pure way to do this. Maybe on a case by case basis this needs to be looked at. The time frame for some ‘approval chains’ is very hard to achieve. We need to communicate together as TAA’s to ensure OEM’s meet the requirements of the regulation.

Chair: Was this level of complexity covered in negotiations?

UK: do not recall this level being discussed. Did the working groups discuss this in multi stage builds?

Austria: This problem hasn’t been discussed in the Council working group.

UK: In complex cases can members states exercise some pragmatism?

Suggested Answers

- a) The Union approval refers to all previous extensions & revisions of the e11 approval number; therefore it is ok to build on.
- b) The chassis cannot be used for the purpose of ECWVTA.

Question 2

Answer		a)	b)
Consensus of TAAM members		X <i>Note: the bus chassis will require a Union Type approval and a supplement issued to the CoC</i>	
Type approving authority "e"			
e1	Germany		
e2	France	Not attending	Not attending
e3	Italy	Not attending	Not attending
e4	Netherlands		
e5	Sweden		
e6	Belgium		
e7	Hungary	Not attending	Not attending
e8	Czech Republic	Not attending	Not attending
e9	Spain		
e11	UK	-	-
e12	Austria		
e13	Luxembourg		
e17	Finland		
e18	Denmark	Not attending	Not attending
e19	Romania		
e20	Poland		
e21	Portugal	Not attending	Not attending
e23	Greece	Not attending	Not attending
e24	Ireland		
e26	Slovenia	Not attending	Not attending
e27	Slovakia		
e29	Estonia		
e32	Latvia	Not attending	Not attending
e34	Bulgaria	Not attending	Not attending

e36	Lithuania	Not attending	Not attending
e49	Cyprus	Not attending	Not attending
e50	Malta	Not attending	Not attending
	Iceland		
	Norway	Not attending	Not attending

Additional comments to question 2	
<p><u>Sweden</u>: The incomplete chassis is already placed on the market (if it is stock and therefore in the yard).</p> <p><u>Austria</u>: the incomplete vehicle was delivered to 2nd stage before Brexit. Therefore incomplete vehicle is ok. This is a solution for vehicles now in production.</p> <p><u>Consensus</u>: agreed on A.</p> <p>Note: this is supported by Article 5 (4)</p>	

TAAM - United Kingdom 2019

Regulation or Directive Number: EU Regulation 2019/26

Subject: Definition of 'placing on the market'

Legislation

Article 5 in EU Regulation 2019/26

Discussion

Commission Notice — The 'Blue Guide' on the implementation of EU products rules 2016 (Volume 59 26 July 2016)

2.2. MAKING AVAILABLE ON THE MARKET

- *A product is made available on the market when supplied for distribution, consumption or use on the Union market in the course of a commercial activity, whether in return for payment or free of charge.*
- *The concept of making available refers to each individual product.*

The making available of a product supposes an offer or an agreement (written or verbal) between two or more legal or natural persons for the transfer of ownership, possession or any other right (47) concerning the product in question after the stage of manufacture has taken place. The transfer does not necessarily require the physical handover of the product.

This transfer can be for payment or free of charge, and it can be based on any type of legal instrument. Thus, a transfer of a product is considered to have taken place, for instance, in the circumstances of sale, loan, hire (48), leasing and gift. Transfer of ownership implies that the product is intended to be placed at the disposal of another legal or natural person.

2.3. PLACING ON THE MARKET

- *A product is placed on the market when it is made available for the first time on the Union market.*
- *Products made available on the market must comply with the applicable Union harmonisation legislation at the moment of placing on the market.*

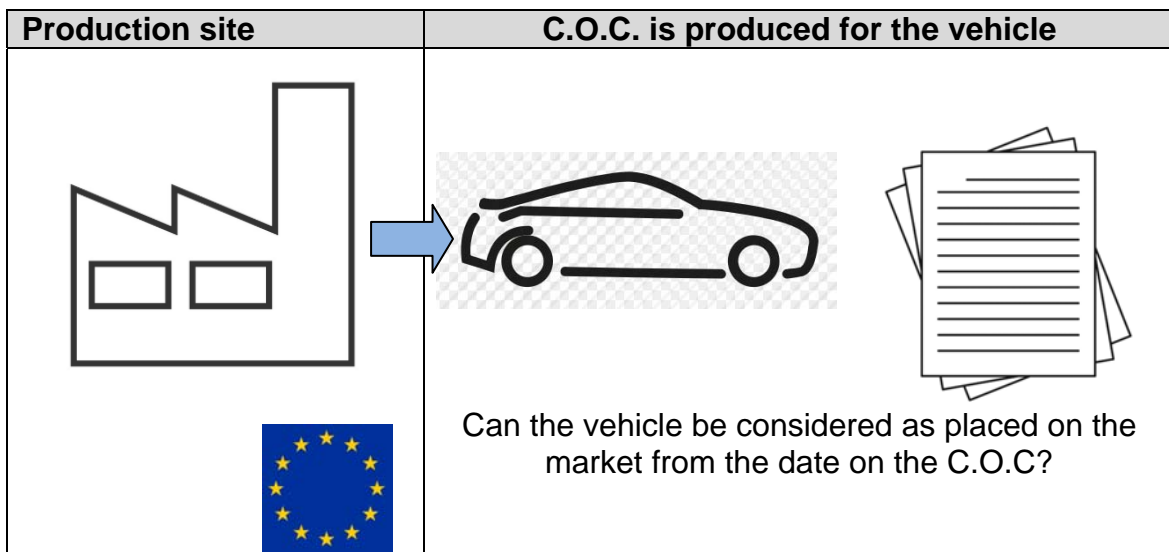
Questions

Question 1) When is a vehicle considered as being placed on the market?

Question 2) How should stock vehicles be dealt with? These vehicles will have a C.o.C. based upon an e11 approval.

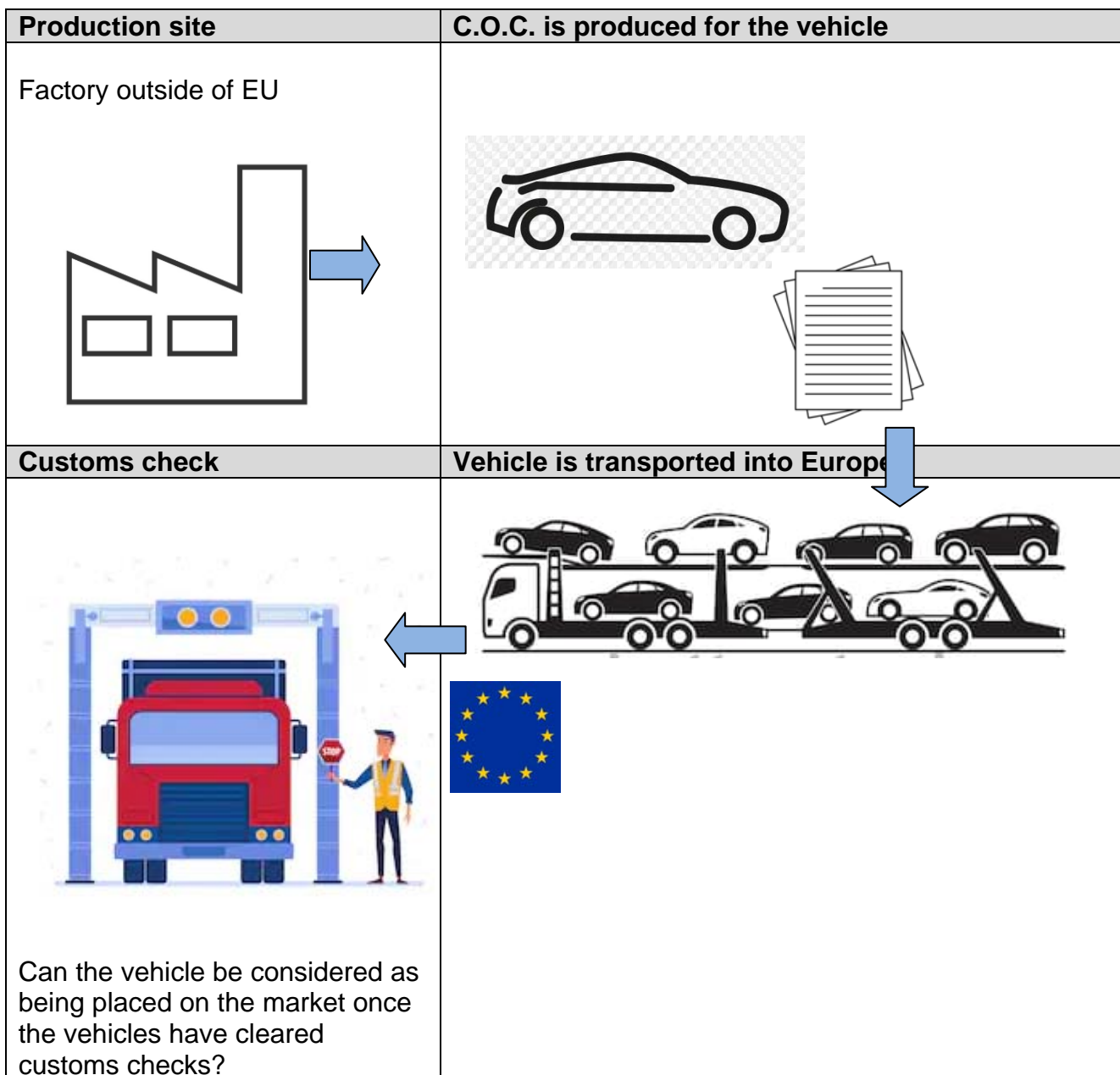
Suggested Answers to Question 1

Option 1 (for vehicle produced in the EU)

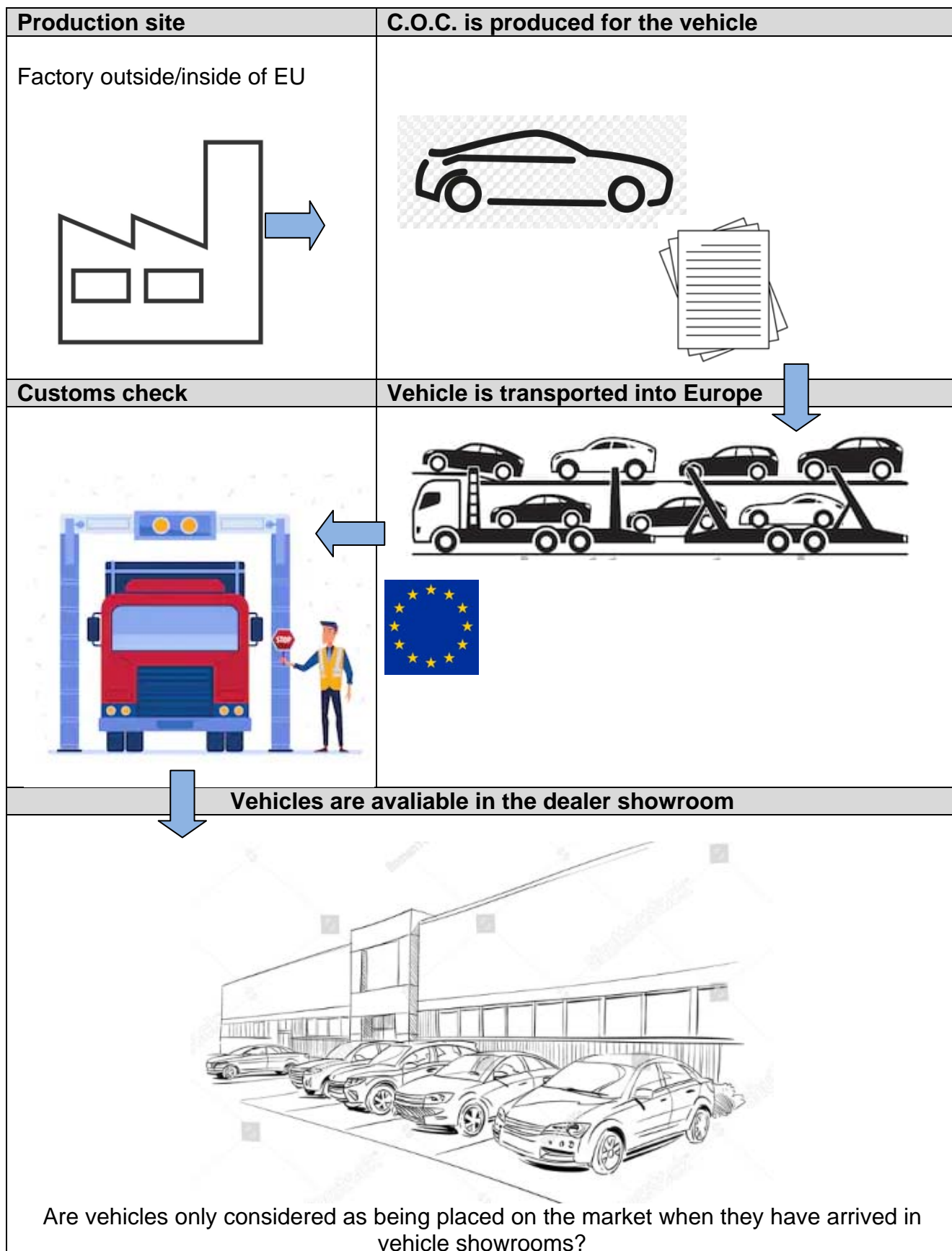


Nb. The vehicle has left the factory and is in the distribution chain.

Option 2 (for vehicle produced outside the EU)



Option 3 (for all vehicles)



Answers

Answer		a)Option 1	b)Option 2	c)Option 3	Additional option presented in meeting
Consensus of TAAM members		For question 1 no overall consensus			<i>When there is a change of legal ownership from the approval holder to an individual or company this can be considered as placed on the market.</i>
Type approving authority "e"					
e1	Germany	X			
e2	France	Not attending	Not attending	Not attending	
e3	Italy	Not attending	Not attending	Not attending	
e4	Netherlands				X
e5	Sweden	X			
e6	Belgium				
e7	Hungary	Not attending	Not attending	Not attending	
e8	Czech Republic	Not attending	Not attending	Not attending	
e9	Spain				
e11	UK	-	-		
e12	Austria				X
e13	Luxembourg				
e17	Finland				
e18	Denmark	Not attending	Not attending	Not attending	
e19	Romania				
e20	Poland				
e21	Portugal	Not attending	Not attending	Not attending	
e23	Greece	Not attending	Not attending	Not attending	
e24	Ireland				

e26	Slovenia	Not attending	Not attending	Not attending	
e27	Slovakia				
e29	Estonia				X
e32	Latvia	Not attending	Not attending	Not attending	
e34	Bulgaria	Not attending	Not attending	Not attending	
e36	Lithuania	Not attending	Not attending	Not attending	
e49	Cyprus	Not attending	Not attending	Not attending	
e50	Malta	Not attending	Not attending	Not attending	
	Iceland				
	Norway	Not attending	Not attending	Not attending	

Additional comments to option 1:

Romania: Ask the producer to issue the invoice for the product. The invoice date would be when the product is placed on the market. It would be very clear.

Austria: The new framework Regulation, although not in power presently, there is a definition for tractors and 2 wheelers (same definition). The COC must be issued (otherwise can't be placed on the market). At least on paper the product is placed on the market of the EU (including UK). This means issuing a COC by itself is not enough.

Germany: Type approval works on the registration date. Not the placing on the market. Say the product is in stock in the UK (when it was in the EU), is the vehicle considered placed on the EU market where it can be transferred? Germany's idea is to grant EoS.

Sweden: Placing on the market is not traditionally seen in type approval. Recital 17 gives more detail. EU Commissions (informal) thought was that it did not have to be within the union territory.

Austria: concerning the EoS issue all this refers to article 41 of the agreement.

Finland: there is a requirement in 2007/46 – there is a requirement that there must be a type approval when the vehicle enters into service. Is recital 17 (referred to by Sweden) only applicable to NRMM/Tractors?

UK: Traditionally 2007/46 only places the obligation to member states that vehicles cannot be registered or put into service if it does not hold an approval. Don't believe there is a restriction for M, N and O. For NRMM and category T the onus is on the person bringing the vehicle to the market.

Austria: the ownership of the vehicle must be changed to a person.

UK: We believe this is the case from the blue book. Just because the CoC exists does not mean that the vehicle has been placed on the market.

Additional comments on option 2:

UK: This has been used in the past for NRMM. At this point it is available for distribution.

Germany: we have a real pragmatic approach with placing in the market. When it is ready for delivery it is placed on the market. A recital is only helpful if I have an issue with the articles.

Additional comments on option 3:

Austria: there have been a lot of discussion regarding the Commission where end of series is requested. However, no such provision has been allowed. The EU Commission must come up with a solution to this problem. The CoC is not invalid due to technical requirements. This is why EoS cannot be used.

Chair: Do the commission have any plans to revisit these requirements?

Austria: not at the moment.

Germany: we will not get new legal text in 8 weeks. We can only work on the basis of this text.

Germany: The OEM can change the VIN plate if in stock and on their control.

Austria: it is not possible in several cases to change the vehicle if the vehicle is elsewhere. There are independent dealers that cannot change the plates.

Question 2

Suggested Answers to Question 2

Answer		
Consensus of TAAM		<i>Question to go to the Commission. The current requirement is that a union approval is obtained (covering all previous extensions) and a supplement to the CoC is issued. This validates the e11 CoC. Can either CoC be used to register vehicles? The suggestion is that the e11 can be used to register the vehicle provided no new technical requirements have entered into force. The e11 will match the VIN plate and prevent future PTI problems. This will be taken forward by RDW to the Commission.</i>
Type approving authority "e"		
e1	Germany	
e2	France	Not attending
e3	Italy	Not attending
e4	Netherlands	
e5	Sweden	
e6	Belgium	Not attending
e7	Hungary	Not attending
e8	Czech	Not attending
e9	Spain	
e11	UK	-
e12	Austria	
e13	Luxembourg	
e17	Finland	
e18	Denmark	Not attending
e19	Romania	
e20	Poland	
e21	Portugal	Not attending
e23	Greece	Not attending
e24	Ireland	
e26	Slovenia	Not attending
e27	Slovakia	
e29	Estonia	

e32	Latvia	Not attending
e34	Bulgaria	Not attending
e36	Lithuania	Not attending
e49	Cyprus	Not attending
e50	Malta	Not attending
	Iceland	
	Norway	Not attending

Additional question:

When should a supplement to the CoC be issued (by the manufacturer) and when should the VIN plate be changed?

Consensus of TAAM members: it is not required to change the VIN plate. Once a Union Type approval is obtained a supplement to the CoC shall be issued by the OEM. This will be valid up until the EU legislation ceases apply to and in the UK.

Additional comments to additional question:

Sweden: state plate is not required to be changed. If Brexit wasn't happening what would happen to the vehicle? It would be registered. Therefore should be no obstacles to bringing the vehicle to the market.

Netherlands: para 4 of article 5. It also has the reference to the type approval mark to the previously approved e11. It only refers to components and STU's, not to vehicles. Therefore just print an eu CoC ontop of e11 CoC. The VIN plate is not required.

Chair: The supplement to the CoC would refer to the e11 but state the new union approval.

Austria: must not forget the further life of the vehicle. The VIN plate is 'e11'. The owner of the vehicle will have a problem at the PTI if registered under e4 or e5. The registration numbers must match. Otherwise the vehicle owner will have a problem at the first PTI.

UK: The CoC, supplementary CoC and registration number will not match. The supplementary CoC data cannot be entered into the database.

Romania: PTI concern is exactly the same.

Sweden: The PTI should determine that the vehicle hasn't deteriorated. Therefore does not think the type approval number should be an issue to PTI.

Austria: also an issue for the police performing checks so not limited to PTI.

Netherlands: fully agree with Sweden. TA number represents the vehicle at the time is was registered.

Germany: not a good idea to have different numbers on the VIN plate and the registration systems. It is not a safe solution.

Sweden: there are a small amount of vehicles with supplements to the CoC. .
Therefore which number you register the vehicle under is not regulated. The e11 could be used to register the vehicle, even if supported with a supplement to the CoC.

Austria: the Commission must decide on this item what to do with vehicles in stock and which number to use. Suggest the next TCMV meeting is used as platform.

Netherlands: they could table the question to the Commission.



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TAAM - United Kingdom 2019

Regulation or Directive Number: EU Regulation 2019/26

Subject: Granting of Union Type Approvals

Legislation

Article 6 Point 4

Discussion

Article 6 Point 4

Questions

- 1) When member states take on e11 approvals and convert them to union type approvals how will they notify other member states and the EU Commission?

This will allow for VCA to confirm that approvals that it had previously issued are no longer valid to ensure good record keeping.

Suggested Answers

a) Circulated document on ETAES

b) Other

Answer		a)	b)
Consensus of TAAM members		X <i>Add approved list (spreadsheet) to the 'news' section of ETAES. Recommend version control of document for each member state.</i>	
Type approving authority "e"			
e1	Germany		
e2	France	Not attending	Not attending
e3	Italy	Not attending	Not attending
e4	Netherlands		
e5	Sweden		
e6	Belgium	Not attending	Not attending
e7	Hungary	Not attending	Not attending
e8	Czech Republic	Not attending	Not attending
e9	Spain		
e11	UK	-	-
e12	Austria		
e13	Luxembourg		
e17	Finland		
e18	Denmark	Not attending	Not attending
e19	Romania		
e20	Poland		
e21	Portugal	Not attending	Not attending
e23	Greece	Not attending	Not attending
e24	Ireland		
e26	Slovenia	Not attending	Not attending
e27	Slovakia		
e29	Estonia		
e32	Latvia	Not attending	Not attending
e34	Bulgaria	Not attending	Not attending
e36	Lithuania	Not attending	Not attending

e49	Cyprus	Not attending	Not attending
e50	Malta	Not attending	Not attending
	Iceland		
	Norway	Not attending	Not attending

Additional comments:

Sweden: will create a spreadsheet for transferred approvals and legacy approvals. The Commission will be notified separately. Maybe the Commission could provide a platform to do this?

Chair: Does ETAES have the capability to do this?

Germany: ECWVTA's have to be uploaded to ETAES. The EU Comm has access. For system and component approvals it is not setup for upload.

UK: Recommend this goes into the news section on ETAES. Member states can upload new revisions as these become available prior to the 29 March 2019.

UK: Can we agree on a format?

Germany/Sweden: Can agree to use the template proposed by the UK.

Comment from the group: initially will be added to the news section of ETAES, longer term will be reviewed.

TAAM - United Kingdom 2019

Regulation or Directive Number: EU Regulation 2019/26

Subject: Union Type Approval Authorities Acceptance of e11 Legacy approvals

Legislation

Article 6 Point 1

Discussion

Legacy e11 approvals granted on 1st January 2008 or later require an EU27 Approval Authority to accept responsibility for it. Some of that responsibility includes that you also become responsible for other approvals for vehicles no longer in production from that manufacturer. What if a manufacturer chooses to work with more than 1 TAA – who will be responsible for which approvals?

Questions

- 1) How should TAA's demonstrate which legacy approvals they have taken responsibility for?

Suggested Answers

- a) TAA stamped document containing a list of approvals on ETAES
 b) Other

Answer		a)	a)
Consensus of TAAM members		X <i>Add approved list (spreadsheet) to the 'news' section of ETAES. Recommend version control of document for each member state.</i>	
Type approving authority "e"			
e1	Germany		
e2	France	Not attending	Not attending
e3	Italy	Not attending	Not attending
e4	Netherlands		
e5	Sweden		
e6	Belgium	Not attending	Not attending
e7	Hungary	Not attending	Not attending
e8	Czech Republic	Not attending	Not attending
e9	Spain		
e11	UK	-	-
e12	Austria		
e13	Luxembourg		
e17	Finland		
e18	Denmark	Not attending	Not attending
e19	Romania		
e20	Poland		
e21	Portugal	Not attending	Not attending
e23	Greece	Not attending	Not attending
e24	Ireland		
e26	Slovenia	Not attending	Not attending
e27	Slovakia		
e29	Estonia		
e32	Latvia	Not attending	Not attending
e34	Bulgaria	Not attending	Not attending
e36	Lithuania	Not attending	Not attending

e49	Cyprus	Not attending	Not attending
e50	Malta	Not attending	Not attending
	Iceland		
	Norway	Not attending	Not attending

Additional comments:
<p><u>Ireland</u>: Important to note that the obligation is on the manufacturer to inform the TAA that they have already got some approvals from another TAA.</p> <p><u>Chair</u>: How can we be sure that all approvals (legacy) have been accounted for?</p> <p><u>Sweden</u>: This information will be contained within one document issued by the Swedish Authority as discussed in question 6(a).</p> <p><u>Netherlands</u>: they raised this question to the UK. This question should not be taken lightly. Particularly important when there is a question regarding the validity of an approval.</p>

TAAM - United Kingdom 2019

Regulation or Directive Number: EU Regulation 2019/26

Subject: Conversion of approvals first issued prior to 1st January 2008

Legislation: Article 6

Discussion

Some component approvals are approved to EC directives that are today still valid in an ECWVTA. Such an example might be EMC component approvals, where an EC directive is still valid for a non-hybrid product.

Questions

If the original approval was granted prior to 1st January 2008, will Type Approval Authorities accept to convert an e11 approval into a Union Approval?

Suggested Answers

Answer		a) Yes	b) No
Consensus of TAAM members		X <i>(it is possible, although authorities not obliged to take on approval)</i>	
Type approving authority "e"			
e1	Germany		
e2	France	Not attending	Not attending
e3	Italy	Not attending	Not attending
e4	Netherlands		
e5	Sweden		
e6	Belgium		
e7	Hungary	Not attending	Not attending
e8	Czech Republic	Not attending	Not attending
e9	Spain		
e11	UK	-	-
e12	Austria		
e13	Luxembourg		
e17	Finland		
e18	Denmark	Not attending	Not attending
e19	Romania		
e20	Poland		
e21	Portugal	Not attending	Not attending
e23	Greece	Not attending	Not attending
e24	Ireland		
e26	Slovenia	Not attending	Not attending
e27	Slovakia		
e29	Estonia		
e32	Latvia	Not attending	Not attending
e34	Bulgaria	Not attending	Not attending
e36	Lithuania	Not attending	Not attending
e49	Cyprus	Not attending	Not attending
e50	Malta	Not attending	Not attending
	Iceland		
	Norway	Not attending	Not attending

Additional comments:

Germany: where does 1st January come from?

Austria: the EU commission added the 1st January 2008 to limit the number of approvals affected. Therefore we believe it is possible to issue an approval first granted prior to 1st January.

UK: review of article 6. Does not think the date of 1st January can be applied to all valid approvals. This date is in reference to legacy approvals. Therefore we think that this is acceptable.

Netherlands: we also believe that if the approval is still valid it can be re-issued.

Austria: if you look at recital 18 we have the last sentence. "To limit the approvals...."
. Therefore it gives a strong indication why this date was added to the legislation.

Chair: provided it can be placed on the market today it is possible.

Austria: the new type approval authority must take on legacy approvals for the purpose of market surveillance. However, if issued before 1st January 2008 it is not obligatory to take it over.



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TAAM - United Kingdom 2019

Regulation or Directive Number: EU Regulation 2019/26

Subject: Non Road Mobile Machinery 97/68 approvals

Legislation

Articles 6 and 7

Discussion

EU Regulation 2019/26 refers frequently to 2016/1628. However, OEM's would like some certainty if 97/68 approvals can also be converted into a union type approval.

Questions

- 1) Can an e11 97/68 approval be converted to a union type approval under the provisions of EU Regulation 2019/26?
- 2) Are replacement engines within the scope of EU Regulation 2019/26 and require to be converted from e11 to a union approval?

The UK understand that if the base approval was issued prior to 2008 then no further action is required by the OEM. However, if the base approval was issued after 2008 then a union type approval can be obtained.

Suggested Answers

Question 1

Answer		a) Yes	b) No
Consensus of TAAM members		X *	
Type approving authority "e"			
e1	Germany		
e2	France	Not attending	Not attending
e3	Italy	Not attending	Not attending
e4	Netherlands		
e5	Sweden		
e6	Belgium	Not attending	Not attending
e7	Hungary	Not attending	Not attending
e8	Czech Republic	Not attending	Not attending
e9	Spain		
e11	UK	-	-
e12	Austria	X	
e13	Luxembourg		
e17	Finland		
e18	Denmark	Not attending	Not attending
e19	Romania		
e20	Poland		
e21	Portugal	Not attending	Not attending
e23	Greece	Not attending	Not attending
e24	Ireland		
e26	Slovenia	Not attending	Not attending
e27	Slovakia		
e29	Estonia		
e32	Latvia	Not attending	Not attending
e34	Bulgaria	Not attending	Not attending
e36	Lithuania	Not attending	Not attending
e49	Cyprus	Not attending	Not attending
e50	Malta	Not attending	Not attending
	Iceland		
	Norway	Not attending	Not attending

* Only Stage IV 56kW-130kW engines as well as IWP engines (≥ 300 kW) and RLL engines can be converted: such a type approval is still valid for placing on the market according to 97/68 and therefore can be converted to a union type approval.

All other engine categories covered and approved by 97/68 cannot be converted to a union approval and are therefore covered by article 7.

Additional comments to Question 1:

UK: some engines can also be approved as R96.04 (except stage V).

UK: The off highway group in the UK will take forward this question to the Commission regarding which engine categories are valid and which are invalid. Once the UK receives this response from the EU Commission the UK will circulate the outcome to other member states. This is expected to be next week.

Guidance document to cover the validity of pre stage V approvals. This is the most current information that we have available to us. Please note this document has not been validated by the EU Commission.

Discussion document: Validity of pre-Stage V type-approvals

Issue & motivation

There has been considerable debate over the past six months on the issue of whether non-current Stage non-road mobile machinery engine exhaust emission type-approvals are either:

- A. Already invalidated by Directive 97/68/EC, or;
- B. Only invalidated at the Stage V placing on market date for the respective engine (sub-) category according to Regulation (EU) 2016/1628 Art 30(2)(a) and Art 58(1)

When considering the impact of Brexit on UK-issued EU type-approvals it is essential to differentiate between those that are invalidated prior to the date that Union type-approval legislation ceases to apply in the UK and those invalidated by Brexit itself. In the case of the former the UK-issued type-approval can continue to be used in accordance with Art. 7 of Regulation (EU) 2019/... complementing Union type-approval legislation and in the case of the latter the manufacturer must apply for under Art. 4, and member state grant under Art. 5, a new EU-27 type-approval at which point the UK-issued approval ceases to be valid. As there is now only a matter of weeks before the first date that EU type-approval legislation may cease to apply in and to the UK it is critical for the smooth functioning of the market that engine manufacturers and member states have a uniform interpretation of which engine exhaust emission type-approval categories are valid and which are invalid as of 01 Jan 2019.

The principle of valid versus invalid approvals used by Directive 97/68/EC

Directive 97/68/EC does not contain a specific article equivalent to Art. 30 of Regulation (EU) that concisely identifies the duration of validity of a type-approval or when a valid type-approval becomes invalid. Nevertheless, it is important to note that 97/68/EC DOES already use the concept of valid versus invalid approvals. Specifically, Article 10(2) of 97/68/EC (end of series) relies upon the principle that a type-approval issued under this Directive for an engine category of a given emission stage becomes INVALID from the placing on the market date of the subsequent emission stage in Article 9(4).

e.g. Stage IIIB categories M & N became invalid after 30 Sept 2014 with the placing on the market date of Stage IV category R

The same principles apply to all emission stages and engine categories in scope of 97/68/EC. This leads to the logical conclusion that, in order for the Directive to work in the manner intended by the co-legislators, all engine categories in 97/68/EC for which the placing on the market deadline has passed are considered INVALID.

It should be noted that similar principles applied in Directive 2003/37/EC and Member States indeed granted end-of-series allowances to manufacturers on the basis that their engine emission type-approval had become invalid prior to registration or entry into service.

In the case of the remaining type-approvals to the final 97/68/EC emission level prior to Stage V for each engine application, these then become INVALID on the Stage V placing on the market date for the respective engine category according to 2016/1628 Art 30(2)(a) and Art 58(1).

Art. 7 of regulation (EU) 2019/... complementing Union type-approval legislation reinforces co-legislators understanding that certain engines utilise invalid type-approvals even if 97/68/EC does not contain an explicit article on 'validity'

e.g. Stage IIIB categories M & N for 56 – 130 kW flex engines which can be produced and placed on market under Art 10(7) of Directive 97/68/EC

Summary of valid and invalid approvals

Taking into account the above principles, the following tables provide a comprehensive list of engine categories in 97/68/EC, divided into those which are valid and those which are invalid as of 01 Jan 2019.

Table 1. List of INVALID engine categories as of 01 January 2019 (Part 1: Variable speed CI)

Description	Stage	Category	Remaining placing on market of engine based upon invalid approval after 29 March 2019				UNECE R96 Permitted as alternative?
			Flex	Transition	NTT transition	Replacement	
Variable speed $130 \leq P < 560$ kW	IV	Q		x		x	Ag tractor only
Variable speed $37 \leq P < 56$ kW	IIIB	P		x		x	Y
Variable speed $56 \leq P < 75$ kW	IIIB	N	x		x	x	Y
Variable speed $75 \leq P < 130$ kW	IIIB	M	x		x	x	Y
Variable speed $130 \leq P < 560$ kW	IIIB	L				x	Y
Variable speed $19 \leq P < 37$ kW	IIIA	K		x		x	Y
Variable speed $37 \leq P < 75$ kW	IIIA	J				x	Y
Variable speed $75 \leq P < 130$ kW	IIIA	I				x	Y
Variable speed $130 \leq P < 560$ kW	IIIA	H				x	Y
Variable speed $37 \leq P < 75$ kW	II	G				x	Y
Variable speed $75 \leq P < 130$ kW	II	F				x	Y
Variable speed $130 \leq P < 560$ kW	II	E				x	Y
Variable speed $18 \leq P < 37$ kW	II	D				x	Y
Variable speed $37 \leq P < 75$ kW	I	C				x	Y
Variable speed $75 \leq P < 130$ kW	I	B				x	Y
Variable speed $130 \leq P < 560$ kW	I	A				x	Y

Table 2. List of INVALID engine categories as of 01 January 2019 (Part 2: Other categories)

Description	Stage	Category	Remaining placing on market of engine based upon invalid approval after 29 March 2019				UNECE R96 permitted as alternative?
			Flex	Transition	NTT transition	Replacement	
Constant speed $19 \leq P < 37$ kW	IIIA	K		x		x	Y
Constant speed $37 \leq P < 75$ kW	IIIA	J*		x		x	Y
Constant speed $130 \leq P < 560$ kW	IIIA	H		x		x	Y
Constant speed $37 \leq P < 75$ kW	II	G	x			x	Y
Constant speed $75 \leq P < 130$ kW	II	F	x			x	Y
Constant speed $130 \leq P < 560$ kW	II	E				x	Y
Constant speed $18 \leq P < 37$ kW	II	D				x	Y
IWT Propulsion < 300 kW	IIIA	V**		x			N
Locomotive propulsion	IIIA	RL				x	N
Locomotive propulsion	IIIA	RH				x	N
Railcar propulsion	IIIA	RCA				x	N
SI engines	I	SN & SH		x***			N
SI engines	II	SN & SH		x			N

* Invalid approval for types $37 \leq P < 56$ kW. Valid approval for engine types ≥ 56 kW.

** Invalid approval for types $P < 300$ kW. Valid approval for engine types ≥ 300 kW.

*** small volume engine family exemption only

Table 3. List of VALID engine categories (current Stage) as of 01 January 2019

Description	Stage	Category	UNECE R96 permitted as alternative?
Any category	V	Any	N
Variable speed $56 \leq P < 130$ kW	IV	R	Ag tractor only
Constant speed $37 \leq P < 75$ kW	IIIA	J*	Y
Constant speed $75 \leq P < 130$ kW	IIIA	I	Y
IWT Propulsion ≥ 300 kW & Aux > 560 kW	IIIA	V**	N
IWT const. Aux $130 \leq P \leq 560$ kW	IIIA	H**	Y
IWT var. Aux $130 \leq P \leq 560$ kW	IV	Q**	N
Locomotive propulsion	IIIB	RB	N
Railcar propulsion	IIIB	RCB	N

* Valid approval for engine types ≥ 56 kW. Invalid approval for types $37 \leq P < 56$ kW.

** Valid approval for engine types ≥ 300 kW. Invalid approval for types $P < 300$ kW.

Question 2)

Answer		a) Yes	b) No
Consensus of TAAM Members:		<i>Yes within scope, however, no need to convert.</i>	
Type approving authority "e"			
e1	Germany		
e2	France	Not attending	Not attending
e3	Italy	Not attending	Not attending
e4	Netherlands		
e5	Sweden		
e6	Belgium	Not attending	Not attending
e7	Hungary	Not attending	Not attending
e8	Czech Republic	Not attending	Not attending
e9	Spain		
e11	UK	-	-
e12	Austria		
e13	Luxembourg		
e17	Finland		
e18	Denmark	Not attending	Not attending
e19	Romania		
e20	Poland		
e21	Portugal	Not attending	Not attending
e23	Greece	Not attending	Not attending
e24	Ireland		
e26	Slovenia	Not attending	Not attending
e27	Slovakia		
e29	Estonia		
e32	Latvia	Not attending	Not attending
e34	Bulgaria	Not attending	Not attending
e36	Lithuania	Not attending	Not attending
e49	Cyprus	Not attending	Not attending
e50	Malta	Not attending	Not attending
	Iceland		
	Norway	Not attending	Not attending

Additional comments to question 2:

Austria: there is no need to convert the e11. They are within the scope of the Regulation but it is not required.



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THE UNITED KINGDOM VEHICLE APPROVAL AUTHORITY

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TAAM - United Kingdom 2019

Regulation or Directive Number: EU Regulation 2019/26

Subject: EC Small Series Certificate of Conformity

Legislation: 2007/46 Annex IX (EC Certificate of Conformity)

Discussion

The European Small Series Certificate of Conformity template requires the additional information of the 'year' and 'sequential number'. This is to ensure that OEM's are not exceeding the limit of 1000 vehicles for M1 and N1. An OEM may control this sequential number via an IT system linked to the vehicle type or European Small Series Type Approval number.

Questions

When an EC Small Series type approval is converted from an e11 to a Union Type Approval is the sequential numbering expected to continue from where the e11 stopped for that production year?

Note: the Union Type Approval is not considered a new type.

Suggested Answers

Answer		a) Yes	b) No
Consensus of TAAM members:		X	
Type approving authority "e"			
e1	Germany		
e2	France	Not attending	Not attending
e3	Italy	Not attending	Not attending
e4	Netherlands		
e5	Sweden		
e6	Belgium	Not attending	Not attending
e7	Hungary	Not attending	Not attending
e8	Czech Republic	Not attending	Not attending
e9	Spain		
e11	UK	-	-
e12	Austria		
e13	Luxembourg		
e17	Finland		
e18	Denmark	Not attending	Not attending
e19	Romania		
e20	Poland		
e21	Portugal	Not attending	Not attending
e23	Greece	Not attending	Not attending
e24	Ireland		
e26	Slovenia	Not attending	Not attending
e27	Slovakia		
e29	Estonia		
e32	Latvia	Not attending	Not attending
e34	Bulgaria	Not attending	Not attending
e36	Lithuania	Not attending	Not attending
e49	Cyprus	Not attending	Not attending
e50	Malta	Not attending	Not attending
	Iceland		
	Norway	Not attending	Not attending



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TAAM - United Kingdom 2019

Regulation or Directive Number: 1958 Agreement and EU Regulation 2019/26

Subject: Acceptance of E11 UNECE Regulation Certificates post Brexit

Legislation

UN ECE 1958 Agreement

Discussion

VCA's understanding is that UNECE E11 Approvals will be accepted for inclusion in EC WVTA and nationally where UN Regulations are required post Brexit, as the UK continues as a contracting party to the 1958 agreement.

Questions

Do TAAM Members share this view?

Suggested Answers

Answer		a) Yes they will be accepted	b) No they will not be accepted
Consensus of TAAM members		X	
Type approving authority "e"			
e1	Germany		
e2	France	Not attending	Not attending
e3	Italy	Not attending	Not attending
e4	Netherlands		
e5	Sweden		
e6	Belgium	Not attending	Not attending
e7	Hungary	Not attending	Not attending
e8	Czech Republic	Not attending	Not attending
e9	Spain		
e11	UK	-	-
e12	Austria		
e13	Luxembourg		
e17	Finland		
e18	Denmark	Not attending	Not attending
e19	Romania		
e20	Poland		
e21	Portugal	Not attending	Not attending
e23	Greece	Not attending	Not attending
e24	Ireland		
e26	Slovenia	Not attending	Not attending
e27	Slovakia		
e29	Estonia		
e32	Latvia	Not attending	Not attending
e34	Bulgaria	Not attending	Not attending
e36	Lithuania	Not attending	Not attending
e49	Cyprus	Not attending	Not attending
e50	Malta	Not attending	Not attending
	Iceland		
	Norway	Not attending	Not attending

Additional comments:

Romania: it is still clear that UNECE approvals from the UK are to be accepted.

Germany: the UK have accepted the UN Regulations by the virtue of signing up from the EU. Therefore is this still valid?

UK: it is fair question. The UK understanding is that we do not need to sign up to them again. Although the mechanism to do this was originally by the EU. Example below:

Germany: there is a footnote via accession of the EU.

¹ By virtue of accession to the Agreement by the European Union.

UK: there is no such footnote anymore.

Sweden: agree no need to do anything.

Chair: we are all in agreement that UNECE Regulation remains valid. There are a number of technical services that seem to be indicating to OEMs that it is not valid (hence the reason for the question).