



TYPE APPROVAL AUTHORITIES MEETING

4 and 5 FEBRUARY 2004 – BRISTOL, ENGLAND, UK

MEETING MINUTES- SUMMARY

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TYPE APPROVAL AUTHORITIES MEETING

4 AND 5 FEBRUARY 2004 – BRISTOL, UK

Attendees:

Austria	Mr Bernhard Sittlinger, Mr Franz Wurst
Belgium	Mr Guy Jacques, Mr Philippe Dewolfs (1 st day only)
Czech Republic	Mr Lubomír Kincl, Mr Josef Pokorny,
European Commission	Mr Wolfgang Schneider (1 st day only)
Finland	Ms Anna Malkamäki, Mr Marko Sinerkari
France	Mr Christophe Polge, Mr Robert Rendu
Germany	Mr Alexander Miese, Mr Frank Wrobel
Hungary	Mr Ákos Pajor, Dr Zoltan Toth
Iceland	Mr Einar Einarsson
Ireland	Mr Rory Brennan, Ms Amanda O'Shea
Latvia	Mr Juris Dzintars
Luxembourg	Mr Romain Lamberty, Mr Claude Liesch
Netherlands	Mr Harry Jongenelen, Mr Freek Plancius
Norway	Mr Erik Sætre
Poland	Wojciech Przybylski
Slovenia	Mr Robert Jerončič
Spain	Mr Carlos Antón, Mr Javier Fadrique, Mr Néstor Martín
Sweden	Ms Anna Ferner, Ms Ingela Sundin
Turkey	Mr Dincer Kara, Mr Erhan Unsal
United Kingdom	Mr Derek Jones (chair), Mr Rob Nixon, Mr Pete Bawn (secretariat), Mr James Eccleston (secretariat), Mr Tony Stenning, Mr Ian Woodruff Introduction only: Mr Derek Harvey, Ms Ann Hale
Not Represented:	Bulgaria, Cyprus, Denmark, Estonia, Italy, Lithuania, Malta, Portugal, Romania, Slovakia, Switzerland

AGENDA

1. Opening of the meeting

2. Adoption of the Agenda

3. Adoption of the minutes from Flensburg 9/10 July 2003

4. Follow up on actions from the Flensburg meeting

4.1. Invitation of Switzerland [Flensburg item 5.1]

4.2. Classification of N category vehicles – proposal to be issued by ACEA to the Commission (to be supported if necessary by Germany and The Netherlands) [Flensburg item 5.3]

4.3. Proposal to be made to amend legislation to remove exemptions for folding seats and provide definition to assist ban of side facing seats [Flensburg item 6.7]

4.4. Review of member state's legal positions regarding approvals to 2001/43/EC (tyre noise) [Flensburg item 6.10]

5. General items

5.1. The status of TAAM decisions (e.g. Complex electronic braking systems) – Germany 1

6. Items relating to framework directive 70/156/EEC (motor vehicles)

6.1. 70/156/EEC: Multi-stage approval for non-M1 vehicles – Netherlands 2

6.2. 70/156/EEC: Retroactive validity of approval extensions – Germany 2

6.3. 70/156/EEC: National codes and nationality abbreviations – Germany 4

6.4. 70/156/EEC: Determination of the vehicle category and bodywork type – Latvia 2

6.5. 70/156/EEC: Acceptance of manufacturer's documentation (name change) – Latvia 3

6.6. 70/220/EEC (Emissions): In-use compliance – Germany 3

6.7. 77/541/EEC (Seat Belts): Use of airbags – Sweden 1

6.8. 92/21/EEC (Masses & Dimensions – M1): Relationship between number of seating positions and towing capability – Netherlands 1

6.9. 97/27/EEC (Masses & Dimensions – Other than M1): Technically permitted maximum laden mass for centre axle trailers – Sweden 3

6.10. 97/27/EEC (Masses & Dimensions – Other than M1): Intention of Annex II paragraph 2.16 – Sweden 4

6.11. 94/20/EC (Couplings): Combination of different couplings into one device – Netherlands 3

6.12. 2001/56/EC (Heating Systems): Paragraph 2.3.3 – France 1

6.13. 2001/85/EC (Bus & Coach Construction): Knee space for seated passengers – UK 1

6.14. 2001/85/EC (Bus & Coach Construction): Knee space for passengers in facing seats – UK 2

6.15. 2001/85/EC (Bus & Coach Construction): Step heights according to Annex VII – UK 3

6.16. 2001/85/EC (Bus & Coach Construction): Height of door control according to Annex VII – UK 4

6.17. 2001/85/EC (Bus & Coach Construction): Application of the bus and coach directive by TAAM countries – Latvia 1

7. Items relating to framework directive 92/61/EEC and 2002/24/EC (motor cycles)

7.1. 2002/24/EC: Definition of low-performance mopeds – Germany 6

7.2. 93/32/EC (Passenger Hand-holds on Two-wheel Vehicles): Applicability of the directive to 3 and 4 wheel vehicles – Spain 1

7.3. 93/93/EC (Masses & Dimensions): Mass of passengers – UK 5

8. Items relating to framework directive 74/150/EEC (agricultural and forestry tractors)

9. Miscellaneous

9.1. Unsuitable designs in general – Sweden 2

9.2. Questions to the delegates and the Commission – Germany 5/1

9.3. Questions to the delegates and the Commission – Germany 5/1

9.4. Common Approach to Complex Electronics in Brake Systems – Belgium

9.5. Distribution of information to new Member States – Latvia

10. Next meetings (Q3 2004) – Location to be established

MEETING MINUTES

1. OPENING OF THE MEETING

Minutes of Meeting:

The meeting delegates were welcomed by VCA's Chief Executive Mr Derek Harvey

2. ADOPTION OF THE AGENDA

Minutes of Meeting:

The agenda was accepted as presented and the following additional items were later added to Section 9 during the course of the meeting:

- 9.4 Common Approach to Complex Electronics in Brake Systems – Belgium
- 9.5 Distribution of information to new Member States – Latvia

3. ADOPTION OF THE MINUTES FROM FLENSBURG 9/10 JULY 2003

Minutes of Meeting:

The minutes of the July 2003 Flensburg meeting were adopted without amendment

4. FOLLOW UP ON ACTIONS FROM THE FLENSBURG MEETING

4.1. Invitation of Switzerland [Flensburg item 5.1]

Minutes of Meeting:

In line with the agreement at the previous meeting in Flensburg, Switzerland were invited to this meeting but unfortunately were unable to attend due to work commitments. They have, however, confirmed that they would like to participate in future TAA meetings

4.2. Classification of N category vehicles – proposal to be issued by ACEA to the Commission [Flensburg item 5.3]

Minutes of Meeting:

The Netherlands confirmed that a proposal had been tabled to increase the number of body- types for N category vehicles. This remains an ongoing item – status to be reported at the next TAAM.

4.3. Proposal to be made to amend legislation to remove exemptions for folding seats and provide definition to assist ban of side facing seats [Flensburg item 6.7]

Minutes of Meeting:

Following agreement at the Flensburg TAAM, the UK submitted proposals for the deletion of the exemptions for folding seats and for a clear definition of side facing seats. These have now been incorporated into proposed amendments to 74/408/EEC, 76/115/EEC, and 77/541/EEC. These amendments also include separate provisions covering seat belt requirements for disabled passengers (not directly related to the TAAM proposals)

It was noted that the proposed amendments were last discussed at Council Working Party on Technical Harmonisation (Motor Vehicles) in Brussels on 28 January 2004.

It was reported that the Commission has accepted the TAAM proposals in principle, but their introduction is being delayed by some ongoing discussion concerning the additional provisions concerning seat belts for disabled people and the possible continued acceptance of side facing seats on certain type of buses/coaches.

4.4. Review of member state's legal positions regarding approvals to 2001/43/EC (tyre noise) [Flensburg item 6.10]

Minutes of Meeting:

There was some discussion about the acceptance of approvals to ECE R30 and it was confirmed that R30 approvals can be accepted as an alternative to 2001/43/EC Annex II but they do not cover the Annex V provisions. The key issue is whether or not vehicle approvals to 2001/43/EC can be issued for vehicles with tyres that only have 92/23/EC or ECE R30 approvals (i.e. tyres that are not approved in respect of tyre/road noise emissions).

UK took the opportunity to explain the background to this issue noting, in particular, that 2001/43/EC Article 2 Section 3 does not mention Annex V (the tyre noise provisions) when specifying requirements for vehicle installation approvals:

[2001/43/EC

4. Article 2 shall be replaced by the following:

1.1.1 'Article 2

1. Member States shall grant EC type-approval, under the conditions laid down in Annex I, to all types of tyres meeting the requirements of Annex II, and shall allocate to these an approval number as specified in Annex I.
2. Member States shall grant EC type-approval, under the conditions laid down in Annex I, to all types of tyres meeting the requirements of Annex V and shall allocate to these an approval number as specified in Annex I.
3. Member States shall grant EC type-approval to all vehicles in respect of their tyres under the conditions laid down in Annex III, where those tyres (including spare tyres, where appropriate) meet the requirements of Annex II and the requirements concerning vehicles laid down in Annex IV, and shall allocate to any such vehicle an approval number as specified in Annex III'.

The UK also noted that the scope of 2002/43/EC Annex V does not mention vehicle installation:

[2001/43/EC

ANNEX V - TYRE/ROAD NOISE EMISSION [2001/43-15]

1. SCOPE

This Annex applies to the EC type-approval of tyres, as components, in respect of tyre/road noise emissions.]

The UK acknowledged that there is some ambiguity caused, for example, by 2001/43/EC Article 10a since, if the directive is only intended to affect the technical requirements for the approval of tyres as components, it is not clear why there should be specific dates for vehicle installations to comply with 2001/43/EC when the vehicle installation requirements are not changed:

[2001/43/EC

6. *the following Article shall be inserted:*

'Article 10a

2. As from 4 August 2003, Member States may no longer grant EC type-approval, and shall refuse to grant national type-approval for those types of tyre which fall within the scope of this Directive and which do not meet the requirements of this Directive, as amended by Directive 2001/43/EC.

3. As from 4 February 2004, Member States may no longer grant EC type-approval or national approval for a type of vehicle, for reasons relating to its tyres or their fitting, if the requirements of this Directive, as amended by Directive 2001/43/EC, are not met.

4. As from 4 February 2005, Member States shall:

(a) consider certificates of conformity accompanying new vehicles in accordance with the provisions of Directive 70/156/EEC as being no longer valid for the purposes of Article 7(1) of the said Directive, if the requirements of this Directive, as amended by Directive 2001/43/EC, are not met, and

(b) refuse the registration or prohibit the sale or entry into service of new vehicles which do not meet the requirements of this Directive, as amended by Directive 2001/43/EC.

5. As from 1 October 2009, the provisions of this Directive, as amended by Directive 2001/43/EC, shall apply for the purposes of Article 7(2) of Directive 70/156/EC, to all tyres which fall within the scope of this Directive, with the exception of tyres of classes C1d and C1e, to which they shall apply as from 1 October 2010 and 1 October 2011 respectively.]

Non the less, it was reported that the advice from the UK Department for Transport Legal Service remains clear that, regardless of the intention of 2001/43/EC, the current wording of the Directive means that VCA must continue to grant vehicle approvals to 2001/43/EC even if the tyres fitted are only approved to 92/23/EC or ECE R30 (i.e. without tests for noise compliance).

The meeting agreed that this topic should remain under review for possible re-discussion at the next TAAM.

5. GENERAL ITEMS

5.1. The status of TAAM decisions (e.g. Complex electronic braking systems) – Germany 1

Minutes of Meeting:

Germany explained that, although the issue of complex electronic braking systems was used as the working example, the purpose of the question was address the broader issue of the authority of TAAM decisions/agreements.

It was agreed that a separate discussion to pursue a common approach to the approval of complex electronics in brake systems (Reference ECE R13 Annex 18) should be covered under Agenda Item 9.4.

The meeting accepted that the TAAM has no formal legal status but there was a unanimous view that it provides an invaluable forum for an exchange of views on European Vehicle Type approval legislation and for the development of common interpretations and understandings in a spirit of co-operation and friendship.

In addition, the TAAM provides an opportunity for Type Approval Authorities to ensure that their European Whole Vehicle and vehicle systems Type Approvals will be accepted in other Member States without problem and it also enables the Authorities to develop common proposals for changes/amendments to modify and clarify legislation.

Although the increase in the number of member states makes it more difficult to organise and manage a TAAM it was considered that the enlargement of the EU makes it even more important for all Member States to adopt a common approach to vehicle Type Approval and this, in turn, makes the role of the TAAM even more relevant.

6. ITEMS RELATING TO FRAMEWORK DIRECTIVE 70/156/EEC (MOTOR VEHICLES)

6.1. 70/156/EEC: Multi-stage approval for non-M1 vehicles – Netherlands 2

Minutes of Meeting:

The meeting accepted that full European Multi-Stage Approval is not yet applicable for N1 category vehicles.

However, it was agreed that modifications of the type described in the Netherlands paper could be covered by a test report from the originating Type Approval Authority which would then be accepted by the Type Approval Authorities of other member states to support National Type Approvals in those countries.

The content of the test report and the level of supporting information required would a matter for the Type Approval Authorities concerned and would be addressed on a case-by-case and country-by-country basis.

6.2. 70/156/EEC: Retroactive validity of approval extensions – Germany 2

Minutes of Meeting:

The meeting agreed that 'B' would be the appropriate solution.

6.3. 70/156/EEC: National codes and nationality abbreviations – Germany 4

Minutes of Meeting:

The meeting acknowledged the practical problems in providing information for all the new member states in item 47 of the Certificate of Conformity and agreed that abbreviations would be a good solution.

However, the meeting considered that a change to Annex IX of the framework directive (70/156/EEC as currently amended by 2001/116/EC) would be necessary before abbreviations could be used and it was agreed that, in co-operation with Germany, the chair should prepare a paper to be sent to the Commission.

There was some discussion about the appropriate form of abbreviation. The Type Approval identifier (e1, e2 etc) was considered as one alternative but the meeting eventually concluded that, because the Certificates of Conformity would be used by Registration Authorities who might not immediately recognise the 'e' codes, it would be better to use the established international vehicle registration identifiers (F for France, D for Germany, GB for the United Kingdom, B for Belgium, etc)

6.4. 70/156/EEC: Determination of the vehicle category and bodywork type – Latvia 2

Minutes of Meeting:

The meeting accepted that definition of vehicle category and body type is often a 'grey' area (not helped by the overlap that exists between the ISO Standard definitions) and it was generally agreed that the starting point would normally be for the manufacturer to declare the vehicle category and body type.

If the Type Approval Authority had any concerns about the manufacture's declaration it was suggested that the following logic sequence could be considered:

- Manufacturer to state objective Vehicle Category e.g. M1 or N1 (or both)
- If vehicle declared as M1 Category:-
 - Vehicle manufacturer to agree type of bodywork with Type Approval Authority
 - If not possible to identify body type as AA, AB, AC, AD or AE then consider AF
 - Apply rules for AF (total number of seats and ratio of payload to passenger load) to check if vehicle can still be classified as M1

It was confirmed that, in the case of M1 vehicles, the ratio of payload to passenger load formula ($P - (M + N \times 68) > N \times 68$) would only apply if the vehicle was classified as body type AF.

- If vehicle declared as N Category:-
 - Apply rules for Section 3 (total number of seats and ratio of payload to passenger load) to check if vehicle can still be classified as N

The meeting considered that, depending on the number of passenger seats, the vehicle featured in the Latvian question could legitimately be classified with both M1 and N1 versions

It was noted that similar vehicles approved by the UK as M1 category vehicles have typically be classified as body type AC (Station Wagon) and hence, for this body type, the ratio of payload to passenger load formula was not applicable

6.5. 70/156/EEC: Acceptance of manufacturer's documentation (name change) – Latvia 3

Minutes of Meeting:

The meeting agreed that 'B' would be the appropriate solution for this question.

It was noted that in some circumstances, for example if the manufacturer actually remains the same but simply changes its name, it would be acceptable to cover the change initially with a 'letter of no concern' and then change the name on the various Type Approval certificates at the time of the next normal extensions.

6.6. 70/220/EEC (Emissions): In-use compliance – Germany 3

Minutes of Meeting:

The meeting recognised the clear principle in 70/156/EEC that the Type approval Authority responsible for issuing an approval is also the one responsible for ensuring that the manufacturer concerned maintains conformity of production. However, the meeting also acknowledged that, under the in-service family parameters of 2003/76/EC, it would be possible for the in-service compliance checks by one TA to identify compliance problems affecting an approval issued by a different authority.

It was generally agreed that it should be possible to deal with this under the current legislative arrangements but that it is important that, when in-service compliance testing involves an in-service family comprising approvals from more than one approval authority, the relevant authorities work together to avoid duplication of audit.

It was suggested that TAAM members should remain mindful of this issue and if problems occur it should be raised for discussion at a future TAAM.

6.7. 77/541/EEC (Seat Belts): Use of airbags – Sweden 1

Minutes of Meeting:

There was no clear consensus on this issue.

Some delegates considered that it would be acceptable to allow airbag operation to be included in test for the approval of a restraint system provided that it was clear that the use of an airbag would always be a condition of the approval. Other delegates were not so sure and it was generally agreed that more time was needed to allow further consideration of this question.

It was therefore agreed that Sweden would re-submit this question as an email query and that the responses to this query would then be discussed at the next TAAM

6.8. 92/21/EEC (Masses & Dimensions – M1): Relationship between number of seating positions and towing capability – Netherlands 1

Minutes of Meeting:

All delegates, apart from France, confirmed that they were following the interpretation from the Commission.

France explained that they held some reservations about this issue and agreed to consider making a proposal for a change to the legislation to allow some flexibility on the number of occupied seats when a vehicle is towing. France also accepted that if they eventually decided not to submit the proposal for legislative change they would be prepared to follow the Commission's interpretation.

6.9. 97/27/EEC (Masses & Dimensions – Other than M1): Technically permitted maximum laden mass for centre axle trailers – Sweden 3

Minutes of Meeting:

The meeting agreed with answer 'A'.

6.10. 97/27/EEC (Masses & Dimensions – Other than M1): Intention of Annex II paragraph 2.16 – Sweden 4

Minutes of Meeting:

The meeting recognised a distinction between:

- a) The technically permissible mass (i.e. the maximum design mass) stated by the manufacturer (reference Annex 1 paragraph 2.6 and cross referred to Annex II item 2.8) for which there is one specified value for a given technical configuration
- and
- b) The intended registration/in-service maximum permissible masses identified in Annex II section 2.16. for which a range of values is possible for each technical specification (Noting that there can also be more than one technical configuration for any approved vehicle type reference Annex II section 2.16.1.).

From the information given in Annex II Section 2.16, each member State may, if required, then determine a single registration/in-service maximum permissible laden mass of a given vehicle technical configuration for operation in its territory (Reference the provisions of Annex IV Paragraph 1.1.2.)

6.11 94/20/EC (Couplings): Combination of different couplings into one device – Netherlands 3

Minutes of Meeting:

After some discussion the consensus view of the meeting was that separate approvals should be issued for each different class of coupling although it would be acceptable for the approval numbers to be listed on one common label.

6.12. 2001/56/EC (Heating Systems): Paragraph 2.3.3 – France 1

Minutes of Meeting:

There were some reservations expressed because the 'letter' of the legislation seems to mandate a label without exception. However, in this case, the meeting felt there was some scope for flexibility because it is not possible for the combustion heater to be operating when the vehicle's engine is turned off and the vehicle's engine must be turned off when refuelling.

The consensus view of meeting therefore eventually moved in favour of answer 'A' as a practical and pragmatic solution to this question.

France agreed to make a proposal for a change to the wording of the legislation to clarify this situation in line with answer 'A'.

6.13. 2001/85/EC (Bus & Coach Construction): Knee space for seated passengers – UK 1

Minutes of Meeting:

The UK delegates provided a practical demonstration of the seat spacing issues.

The meeting was initially split between solution 'A' and solution 'B', with the Commission, in particular, considering that the 280mm dimension was to allow for easy access to the seat and therefore applicable for all forward facing seats not just those behind a solid partition or bulkhead.

The Netherlands pointed out that this very issue had recently discussed by GRSG and a proposed amendment to ECE R36 will be on the agenda for WP29 on 9-12 March 2004. One of the proposed changes to R36 is as follows

Paragraph 5.7.8.5.1., amend to read:

"5.7.8.5.1. For a seat behind a partition or other rigid structure other than a seat, a minimum clear space in front of each passenger seat shall be provided as shown in annex 3, figure 8.

and

Annex 3, Figure 8, amend the title to read:

"Figure 8

SPACE FOR SEATED PASSENGERS BEHIND A PARTITION OR OTHER RIGID STRUCTURE OTHER THAN A SEAT (see paragraph 5.7.8.5.1)"

And the original justification for this amendment was given as follows:

'to clarify the interpretation of paragraph 5.7.8.5.1 and Annex 3 figure 8 which was intended not to impose any additional requirements on seat spacing but instead to determine the clear space between a passenger seat and a partition or other rigid structure other than a seat'

[Note: Paragraph 5.7.8.5.1 and Annex 3 Figure 8 in ECE R36 are directly equivalent to 2001/85/EC paragraph 7.7.8.5.1 and Annex 3 Figure 13 respectively]

The meeting accepted that these proposed amendments to R36 added support to acceptance of Solution 'B' as the appropriate interpretation of the 280mm requirement.

It was agreed that, subject to WP29 acceptance of the proposed amendments to R36, the UK would make a proposal for corresponding changes to 2001/85/EC and there was general TAAM agreement to use Solution 'B' as a working interpretation in the meantime.

6.14. 2001/85/EC (Bus & Coach Construction): Knee space for passengers in facing seats – UK 2

Minutes of Meeting:

Following on from the previous question (Agenda Item 6.13), and the associated interpretation of paragraph 7.7.8.5.1, the meeting consensus was in favour of Solution 'A'

6.15 2001/85/EC (Bus & Coach Construction): Step heights according to Annex VII – UK 3

Minutes of Meeting:

During the early discussion there was a view that for any vehicle approved to Annex VII all steps throughout the whole vehicle must comply with the step requirements of Annex VII.

However, it was pointed out that all Class 1 vehicles must always comply with Annex VII and yet (different) step requirements are also identified for Class 1 vehicles in the standard specifications of Annex I.

It was suggested that this means that the Annex VII steps heights are only applicable in those areas of the bus intended for access by passengers with reduced mobility and that Annex I step height dimensions are acceptable for the rest of the bus.

By the end of the discussion there was a clear majority in support of Solution B although it was agreed that the outcome of ongoing GRSG/WP29 discussions on this subject should be closely monitored.

6.16. 2001/85/EC (Bus & Coach Construction): Height of door control according to Annex VII – UK 4

Minutes of Meeting:

The meeting expressed concern that emergency controls could be misused if they were in easy reach of children and there was a general consensus in support of Solution A

6.17 2001/85 (Bus & Coach Construction): Application of the bus and coach directive by TAAM countries – Latvia 1

Minutes of Meeting:

Since this is, in effect, a survey questionnaire that requires separate replies from each country, it was agreed that the delegates would send individual responses to Latvia after the TAAM.

7. ITEMS RELATING TO FRAMEWORK DIRECTIVE 92/61/EEC AND 2002/24/EC (MOTOR CYCLES)

7.1. 2002/24/EC: Definition of low-performance mopeds – Germany 6

Minutes of Meeting:

The meeting considered that the note at the end of Annex I was clear and a ‘low-performance moped’ must have pedals. The meeting therefore agreed with Solution ‘B’.

7.2. 93/32/EC (Passenger Hand-holds on Two-wheel Vehicles): Applicability of the directive to 3 and 4 wheel vehicles – Spain 1

Minutes of Meeting:

The meeting agreed that the current legislation only applies to two wheeled vehicles and hence ‘A’ is the relevant solution.

There was general concern, therefore, that passengers can be allowed on quadricycles without the need for approved handhold.

It was also noted that the technical requirements for handhold on 3 and 4 wheeled vehicles (lateral and vertical forces) differ significantly from those appropriate for 2 wheeled machines (typically vertical forces).

Spain agreed to propose an amendment to 93/32/EC to cover requirements for passenger hand-holds on 3 and 4 wheeled vehicles.

7.3. 93/93/EC (Masses & Dimensions): Mass of passengers – UK 5

Minutes of Meeting:

Although there was some discussion and concern about the potential overloading of a 4-seat quadricycle, the meeting agreed that the mass of the passengers is not regulated and the 75 kg mass (Annex paragraph 1.7) only applies to the driver and not the passenger(s).

Hence, it was accepted that it is the responsibility of the driver to ensure that the total mass of the passengers does not exceed the allowed 200kg payload (e.g. one adult and two children) and ‘B’ was agreed as the appropriate solution.

Norway agreed to consider making proposal for an amendment to regulate passenger masses for quadricycles.

8. FRAMEWORK DIRECTIVE 74/150/EEC (AGRICULTURAL AND FORESTRY TRACTORS)

Minutes of Meeting:

No items to report.

9. MISCELLANEOUS

9.1. Unsuitable designs in general – Sweden 2

Minutes of Meeting:

Whilst the meeting shared Sweden's concerns about some designs that might be deemed to be 'unsuitable' there was general agreement that, provided the relevant legislative requirements are met, Type Approval Authorities should not impose additional requirements.

The appropriate action would be for the member state to propose changes to the legislation that would henceforth forbid the designs considered to be 'unsuitable'.

9.2. Questions to the delegates and the Commission – Germany 5/1

There are sometimes problems to get information concerning system approvals or approvals for separate technical units or parts. Although the necessity to get this information is pointed out to the concerned authority, there is no response. Even a question to the commission earns any reaction.

How shall the TAA act to get the information or copies of the approvals?

Minutes of Meeting:

The meeting supported the German concern that not all Member States fully co-operated with the principle of the free and prompt exchange and supply of information between Type Approval Authorities as and when required. The meeting noted that one Member State, in particular, had developed a reputation for a lack of co-operation. The Member State concerned was not in attendance at this TAAM.

It was felt that the TAAM provided the ideal environment for achieving/maintaining good working relationships between Type Approval Authorities and the chair agreed to write to the Country concerned to try to encourage them to take a more active role in future TAAM activities and thereby improve their co-operation.

9.3. Questions to the delegates and the Commission – Germany 5/2

Who of the TAA actually grant approvals according directive 97/68/EC for mobile machinery?

Minutes of Meeting:

A round table survey gave the following responses:

Type Approval Authorities that are responsible for 97/68/EC approvals: Belgium, Czech Republic, Finland, France, Germany, Hungary, Ireland, Netherlands, Slovenia, Sweden (from mid-2004), Turkey, UK

Type Approval Authorities that are not responsible for 97/68/EC approvals: Austria, Iceland, Latvia

Type Approval Authorities that will send details to Germany after the meeting: Norway, Poland, Spain

9.4. Common Approach to Complex Electronics in Brake Systems – Belgium 1

Minutes of Meeting:

Following from Item 5.1, it was agreed that the meeting should take this opportunity to confirm a common approach to the approval of complex electronic system in vehicle braking approvals.

Belgium prepared a statement that was then developed and unanimously agreed by all delegates as follows:

Type approval of brake systems using complex electronic systems

In agreement with the decision taken during the TAAM meeting in Brussels (agenda 6.13), the TAAM members strongly supported the necessity to perform the conformity assessment procedure (including test report) as defined in Annex 18 of Regulation 13.09, or Annex 8 of Regulation 13H, in addition to the other requirements foreseen in Directive 71/320/EEC as amended.

If the manufacturer requires an EC certificate for this type of braking system, the member state may issue such a certificate but must also include the test report and information foreseen in 13H (annex 8) or Regulation 13.09 (annex 18) as a basis for presentation. A comment will be added into the remarks section of that certificate.

9.5 Distribution of information to new Member States – Latvia

Minutes of Meeting:

Mindful of the need for information to be supplied to the states that will become new members of the EU from May, Latvia asked if Type Approval Authority contact details were available for all the new Member States.

It was agreed that the current contact details would be included with the TAAM minutes with a request for all delegates to update the information where necessary.

10. NEXT MEETINGS

Minutes of Meeting:

France kindly agreed to host the next TAAM which will be held in Q2/Q3 2004

Spain then kindly agreed to host the subsequent meeting in Q1/Q2 2005

Derek Jones
VCA
3 March 2004