RDW

TAAM 2018

Meeting Minutes

Utrecht

The Netherlands

Attendees

List of Attendees			
TAA	**Country**	**Name**	**Organisation**
e1	Germany	Sven Paeslack	KBA
e2	France	Victor Bormand	CNRV
e2	France	Gwendellyn Quentric	CNRV
e3	Italy	Luca Rocco	Ministry of Infrastructure & Transport
e4	The Netherlands	Maarten Balk	RDW
e4	The Netherlands	Tim Guiting	RDW
e4	The Netherlands	Hans Lammers	RDW
e4	The Netherlands	Richard Kors	RDW
e4	The Netherlands	Arjan Dijkhuizen	RDW
e4	The Netherlands	Robin Draaijer	RDW
e5	Sweden	Patrick Hammarbäck	Swedish Transport Agency
e6	Belgium	Ann Vereecken	Departement MOW, Flemish region
e6	Belgium	Ronny Verhelst	Departement MOW, Flemish region
e6	Belgium	Alain Descamps	SPW, region Wallonia
e7	Hungary	--	
e8	Czech Republic	Miloslav Knizek	Ministry of Transport
e8	Czech Republic	Martin Tichý	Ministry of Transport
e9	Spain	Llouis Sans	Idiada
e11	United Kingdom	Derek Lawlor	VCA
e11	United Kingdom	Steve Holdcroft	VCA
e11	United Kingdom	Peter Rowe	VCA
e11	United Kingdom	Chris Mccabe	VCA
e12	Austria	Franz Höller	Type-approval Authority
e13	Luxembourg	Luc Schmitt	SNCH
e13	Luxembourg	Laurent Linden	SNCH
e14	Switzerland	Florian Hess	Federal Roads Office
e16	Norway	Erik Saetre	Vegdirektoratet
e17	Finland	Harri Tenhunen	Finnish Transport Safety Agency TRAFI
e17	Finland	Marko Sinerkari	Finnish Transport Safety Agency TRAFI
E18	Denmark	--	
e19	Romania	Toader Bogdan	Romanian Automotive Register
e19	Romania	Alin Rosca	Romanian Automotive Register
e20	Poland	Kaja Mitkowska-Kopka	Type-approval Department
e21	Portugal	--	
e23	Greece	--	
e24	Ireland	Aidan Barrett	Type-approval Authority
e24	Ireland	Rory Brennan	Type-approval Authority
e25	Croatia	--	
e26	Slovenia	Jože Tršelič	Slovenian Traffic Safety Agency
e27	Slovakia	Lubomir Moravcik	Ministry of Transport TAA Dept.
e27	Slovakia	Jan Javorcik	Ministry of Transport
e29	Estonia	Jürgo Vahtra	Estonia Road Administation
e29	Estonia	Alar Allaste	Estonia Road Administation
e32	Latvia	Valdis Blekte	Type-appproval Authority CSDD
e32	Latvia	Intars Krots	Type-appproval Authority CSDD
e34	Bulgaria	--	
e36	Lithuania	--	
e49	Cyprus	--	
e50	Malta	--	
	Iceland	Kristinn Gretarsson	Icelandic Transport Authority
	Iceland	Olafus Gunnarsson	Icelandic Transport Authority

Part 1.

2007/46/EC

1.1

Czech Republic
E8; e8

2007/46 EC Small Series Type Approval

SUBJECT: Obligation of ABS fitting– vehicles M_1

REFERENCES: 2007/46/EC Annex IV Appendix 1 Table 1 item 9B; UN Regulation 13-H, (EC) No. 661/2009

QUESTION:

For type-approval of EC small series the requirements 2007/46/EC Annex IV Appendix 1 shall be complied with. According to those requirements some flexibility is allowed, as like the partial application of UN and/or EU Regulations. In particular, certain exemptions are permitted, e.g. ESC, BAS and TPMS is not required.

However there is uncertain whether ABS is mandatory or not. UN Regulation 13-H sets down technical requirements for ABS, but it does not prescribe explicitly that ABS is mandatory (in contrast to UN Regulation 13 where the compulsory ABS is explicitly stipulated and a few possible exemptions are specified). The relative form of obligation to be fitted with ABS is set down indirectly by transitional provisions ("Contracting Parties applying this Regulation may refuse first national registration of a vehicle which …. and is not fitted with an ESC and a BAS"). Further, there is set down that vehicles fitted with BAS stall be fitted obligatory also with ABS.

As far as we know, for EU small series some TAA's require ABS as compulsory, the others not. A unified approach is very needed.

Type approving authority "e"	8

Possible solution		Accepted	Refused
The fitting of BAS, ESC and ABS shall not be required. If fitted, they shall comply with the requirements of UNECE Regulation No 13-H.	**A**	**X**	
The fitting of BAS and ESC shall not be required. If fitted, they shall comply with the requirements of UNECE Regulation No 13-H. The fitting of ABS as a basic element of security shall be required.	**B**		**X**

COMMENT: We propose to initiate to supplement in UN Regulation 13-H a clear provision concerning the compulsory fitting of ABS, analogous to that already present in UN Regulation 13.

RESULT: Czech Republic, France, Germany, Greece, the Netherlands and the UK support solution A. Italy initially supports solution B but agrees with solution A. > In the end, there is consensus on solution A.

1.2

Czech Republic
E8; e8

2007/46 EC Small Series Type Approval

SUBJECT: Interpretation of lateral collision requirements – vehicles M_1

REFERENCES: 2007/46/EC Annex IV Appendix 1 Table 1 item 54A; UN Regulation 95; (EC) No. 661/2009

QUESTION:

For type-approval of EC small series the requirements 2007/46/EC Annex IV Appendix 1 shall be complied with. According to those requirements some flexibility is allowed, as like the partial application of UN and/or EU Regulations.

Requirements concerning lateral collision are specified in Table 1, item 54A. Here, in the older versions of this Regulation, specific provisions were set down under the heading “Head form test”. Now, in the version in force, requirements of category C were inserted with application from 01.11.2014. In our opinion from this date only the requirements C shall be applied. However, as the head form test requirements have not been removed from the said item, as it would be consequent, some TAA’s require to apply both kinds of requirements and the other TAA’s are of the opinion that it is possible to apply one or the other kind of requirements. It is necessary to remind that an application of both kinds of requirements results in even more stringent requirements than those set down for M_1 in unlimited series.

A unified approach is much needed.

Type approving authority “e”	8

Possible solutions		Accepted	Refused
As from 01.11.2014 in 2007/46/EC Annex IV Appendix 1 Table 1 item 54A only the requirement of category C is valid. Head form test requirement should be removed from this item.	**A**	**X**	
In 2007/46/EC Annex IV Appendix 1 Table 1 item 54A it is possible to choose between C requirement and Head form test requirement or apply both kinds of requirements.	**B**		**X**

COMMENT: We propose to initiate an amendment of 2007/46/EC Annex IV Appendix 1 Table 1 item 54A in order to remove Head form test requirement.

RESULT: Czech Republic` Germany, Italy and the Netherlands support solution A, Spain and the UK support solution B. The Netherlands proposes to forward this question to the TAAEG. After some discussion this proposal is adopted.
> The decision is made to transfer this question to the TAAEG, the Czech Republic will prepare a clear description.

1.3

France	Directive 2007/46/EC, Annex XVII Multistage EC type-approval	

Subject: Maximum permissible width to be taken into account.

Reference: Framework Directive 2007/46/EC, Annex XVII

> 2. OBLIGATIONS OF TYPE-APPROVAL AUTHORITIES
>
> 2.1. The type-approval authority shall:
>
> (a) verify that all EC type-approval certificates issued pursuant to the regulatory acts which are applicable for vehicle type-approval cover the vehicle type at its state of completion and correspond to the prescribed requirements;

Context

There are countless different cases where a second-stage manufacturer adds pieces of bodywork to a first-stage EC type-approved chassis-cab to get a final completed vehicle EC type-approved according to the 2nd stage EC WVTA procedure described in Annex XVII to Directive 2007/46/EC, for instance refrigerated lorries.

Most 1st stage EC WVTAs cover complete and incomplete variants in the same vehicle type:

- Complete variants have bodywork and are fully compliant with the regulatory acts they are subject to
- Incomplete variants without bodywork need completion before entry into service.

For incomplete variants, Annex III to Directive 2007/46/EC provides information fields to set boundaries the completed vehicle must not outreach.

In what follows, we will consider 1st stage chassis-cabs variants. Hereunder are data extracted from the information document related to masses & dimensions:

2.4.1.	For chassis without bodywork.	
	(...)	
2.4.1.2.	Width.	
2.4.1.2.1	Maximum permissible width:	2500 – 2550 mm
2.4.1.2.2	Minimum permissible width:	2500 mm
2.4.2.	For chassis with bodywork	
2.4.2.1.	Length.	Max 12000 mm
2.4.2.1.1	Length of the loading area:	≤ 7650 mm
2.4.2.2.	Width.	2500 – 2600 mm
2.4.2.2.1	Thickness of the walls (in the case of vehicles specially designed for the controlled temperature carriage of goods):	≥45 mm for vehicle width ≤2600 mm

Question

Which field from the 1st stage type-approval information document sets maximum width values completed 2nd stage refrigerated lorries shall not outreach?

Possibilities of solution

	Type-approval authority	e2
A	2.4.1.2.1 → 2nd stage vehicles must not outreach 2,55 m.	X
B	2.4.2.2 → 2nd stage refrigerated lorries become chassis with bodywork. Therefore, they can be up to 2,60 m wide.	

RESULT: The Netherlands: section 2.4.1.2.1. applies to incomplete vehicles; section 2.4.2.2. to complete or completed vehicles. Part 2 should indicate which section applies to which TVV. Belgium, France and the Netherlands support solution A. The Czech Republic, Finland, Germany, Ireland, Italy, Slovakia and Slovenia support solution B, In the discussion, there appear to be different views. Spain: The system approvals should cover the width 2.6. Italy: The body is not specified so this can change in the second stage.
> The majority is in favour of solution B but there is no common understanding.

1.4

France	Directive 2007/46/EC, Annex II Criteria for the categorisation of vehicles in category N	

Subject: Criteria required for vehicles fitted with insulated walls to meet category N provisions.

Context

- Regulation (EU) no 678/2011 has completely rewritten Annex II to Directive 2007/46/EC.
- This new Annex II set out further requirements to categorise vehicles in category N (Part A, § 3) such as mandatory installation of ISO 27956:2009 lashing devices when persons and goods are transported in the same compartment.
- These requirements shall apply to new vehicle types approved as of 29 October 2012.

Reference: Framework Directive 2007/46/EC, Annex II, Part A

3. **Criteria for the categorisation of vehicles in category N**

3.1. The categorisation of a vehicle type in category N shall be based on the technical features of the vehicle as referred to in points 3.2 to 3.6.

3.2. As a matter of principle, the compartment(s) where all the seating positions are located shall be completely separated from the loading area.

3.3. By way of derogation from the requirements of point 3.2, persons and goods may be transported in the same compartment under the condition that the loading area is provided with securing devices designed to protect persons transported against the displacement of the load during driving, including severe braking and cornering.

3.4. Securing devices - lashing devices - intended for securing the load as required in point 3.3 as well as partitioning systems, intended for vehicles up to 7,5 tonnes shall be designed in accordance with the provisions of Sections 3 and 4 of Standard ISO 27956:2009 'Road vehicles – Securing of cargo in delivery vans – Requirements and test methods'.

Issue

Second stage manufacturers of refrigerated vehicles (see example in Appendix 1) are concerned about the consistency between the provisions set out in § 3.3. & 3.4. above-mentioned and the requirements from ATP agreement they shall meet in order to be allowed to carry perishable foodstuffs.

For instance, on one hand, ATP requires the applicant to ensure the maintenance of thermal insulation and provides cleaning rules; on the other hand ISO 27956:2009 requires minimum strength values for the installed lashing devices. These requirements may not be fulfilled when the 2nd stage manufacturer either has to use the 1st stage lashing devices and make them pass through the insulating wall which may cause thermal losses, or take off the 1st stage lashing devices and stick new ones without guarantee of keeping the properties of the insulating wall and being strong enough to undergo the standardised forces.

Furthermore, the concept of complete separation does not really fit with refrigerated vans (BB). Indeed, considering those lorries where the driver compartment and the cargo area form a single unit (cf. Annex II, Part C, § 3.2.) as being part of the vehicles mentioned in § 3.2. would be inconsistent with the definition of "separate cab" set out in ECE R29.03 and R58.03 and the requirements it entails:

"separate cab: a cab attached to the vehicle's frame by specific links and which has no common part with the cargo area"

Anyway, we would be very interested in your point of view about the applicability of § 3.3. & 3.4. for vehicles fitted with insulated walls

Question

Are vehicles fitted with insulated walls subject to requirements set out in § 3.3 & 3.4 and do they need to be equipped with ISO 27956:2009 lashing devices?

Possibilities of solution

	Type-approval authority	e2
A	Yes. Complete separation between the driver compartment and the cargo area means the opposite of "forms a single unit" which characterises "BB" vehicles (→ means vehicles with "BA" or "BE" bodies) to be consistent with ECE R29/R58 "separate cab" definition	
B	No. The insulating walls ensure a complete separation between the driver compartment and the cargo area. Vehicles like the one in Appendix 1 meet § 3.2 requirements, therefore they are not subject to § 3.3 & 3.4.	
C	No. "Completely separated" means the opposite of "forms a single unit" which characterises "BB" vehicles. However, in the specific case of vehicles fitted with insulated walls, the installation of lashing devices as provided in § 3.3 & 3.4. should not be mandatory.	

RESULT: The Netherlands supports solution B. Because the insulating wall ensures a complete separation between the driver compartment and the cargo area, the lashing devices do not have to be present. France, Germany, Italy, the Netherlands, Poland, Romania and the UK support solution B, > There is consensus on solution B.

Appendix 1

The ISO 27956:2009 lashing devices are circled in red

1.5

Germany: 2007/46/EG, Annex IX – Certificate of Conformity

KBA

18.05.2018

1. Reference:

2007/46/EG, article 18 and annex IX

(1) The manufacturer, in his capacity as the holder of an EC type-approval of a vehicle, shall deliver a certificate of conformity to accompany each vehicle, whether complete, incomplete or completed, that is manufactured in conformity with the approved vehicle type.

(4) The certificate of conformity shall be completed in its entirety and shall not contain restrictions as regards the use of the vehicle other than those provided for in a regulatory act.

2007/46/EG, Annex IX, item 0

The certificate of conformity also serves the purpose to enable the competent authorities of the Member States to register vehicles without having to require the applicant to supply additional technical documentation. For these purposes, the certificate of conformity has to include:

(a) the Vehicle Identification Number;
(b) the exact technical characteristics of the vehicle **(i.e. it is not permitted to mention any range of value in the various entries)**.

2. Issue:

According to the specimen in 2007/46/EG, Annex IX, side 2, item 35 the declaration of the tyre/wheel combination is compulsory. The speed and load indices depend on the characteristics of each individual vehicle (for example technically permissible maximum laden mass and maximum speed). Manufacturers deliver their vehicles with different kinds of tyres. These tyres have variable speed and load indices which can be higher than the minimum standard according to the type approval.

3. Interpretation (KBA)

In item 35 of the CoC the individual technical characteristics (e. g. speed and load indices) of the tyres which are installed on the vehicle has to be stated.

Question

Shall item 35 contain the individual technical characteristics of the installed tyres or the minimum technical required characteristics of the vehicle type?

Possibilities of solution

A	In item 35 of the CoC exactly the individual technical characteristics (e. g. speed and load indices) of the tyres which are installed on the vehicle has to be stated?
B	In item 35 of the CoC just the minimum technical requirements for load and speed index (has to be confirmed by the type-approval) may be stated. It is possible to deliver a vehicle with tyres which have a better technical parameters (e. g. higher speed and load indices).

Type approving authority "e"	1

Possible sol tio		accepted	refused
A		X	
B			X

RESULT: Romania: has checked hundreds of vehicle type-approvals and CoC's and does not see the speed and load Index on many CoC's. Germany, the Netherlands, Romania and the UK support solution A as the correct answer. Austria, Belgium, Estonia, Italy, Romania and Norway support solution B. France support solution A for M1, M2, N1, N2 on WLTP, and solution B: for the other categories. The Netherlands: we believe option A is correct but we allow for option B. France: we can accept option B but under WLTP, this will change. Because of the different opinions it is difficult to reach consensus. The Netherlands: The solution is that it should indicate the actual tyres fitted. This is also the future. Therefore, the member states should change their registration system. Maybe we should change the wording in the CoC. > No consensus is reached. The decision is made to discuss this subject in EReg and come back during to the next TAAM.

1.6

ITALY QUESTION N. 1

SUBJECT: EU 2017/1151 - prescriptions concerning road load coefficients.

REFERENCE:

Into general requirements of Reg. EU 2017/1151 is written:

"The manufacturer is responsible for the accuracy of the road load coefficients and will ensure this for each production vehicle within the road load family. Tolerances within the road load determination, simulation and calculation methods shall not be used to underestimate the road load of production vehicles. At the request of the approval authority, the accuracy of the road load coefficients of an individual vehicle shall be demonstrated".

Can the manufacturer perform the coast-down for road load coefficients determination by itself before application for the approval and consequently submit to the technical service the report and values (issued according example contained into the regulation)?

REMARKS:

The manufacturer is the responsible for the road load coefficients accuracy. The road load coefficients must be reported into the information document (application for approval) and it must be submitted to the Technical Service at the moment of application for approval.

QUESTION:

Can the manufacturer perform the coast-down for road load coefficients determination by itself before application for the approval and consequently submit to the technical service the report and values (issued according example contained into the regulation)?

Possible solution:		**accepted**	**refused**
The manufacturer performs the coastdown for road load coefficients determination by itself before application for the approval and consequently submit to the technical service the report and values.			
Other			

RESULT: Germany supports solution A, France, Luxembourg, the Netherlands, Spain and the UK support solution B. The Netherlands declares that it must be witnessed by the Technical Service. Luxembourg request this as well. Germany: We accept the coast‑down by the manufacturer only if it is checked/audited by KBA or by the Technical Service. Italy does not support solution A and considers that solution B should actually be tested.
> There is consensus on solution B.

1.7

ITALY QUESTION N. 3

SUBJECT: Regulation 65/2012/EU (GSI) - Functional requirements for GSI (paragraph 2. of Annex I).

REFERENCE:

Paragraph 2. of Annex I

2.2. The GSI shall be designed to encourage an optimised fuel efficient driving style under reasonably foreseeable driving conditions. Its main purpose is to minimise the fuel consumption of the vehicle when the driver follows its indications. However, regulated tailpipe emissions shall not be disproportionately increased with respect to the initial state when following the indication of the GSI. In addition, following the GSI strategy should not have any negative effect on the timely functioning of pollution control devices, such as catalysts, after a cold start. For this purpose vehicle manufacturers should provide technical documentation to the type-approval authority, which describes the impact of the GSI strategy on the vehicle's regulated tailpipe emissions, under at least steady vehicle speed.

BACKGROUND:

The GSI Regulation requires that an OEM should demonstrate (as part of formal documentation) that tailpipe emissions shall not increase disproportionately when following the indication of the GSI. From Euro 6b to Euro 6d, NEDC has been replaced by WLTC. The new cycle has no fixed gear shift point but they are specific for each vehicles, derived from a function of mass, road load, drivetrain and full load curve. The WLTP introduce more realistic testing conditions, and the GSI influence on WLTC is a consequence.

QUESTION:

Is the demonstration of regulated tailpipe emissions that shall not be disproportionately increased when following the indication of the GSI, still required under NEDC even if approval is granted under WLTP?

POSSIBLE SOLUTION:

A	Yes, because WLTP introduce more realistic testing conditions, and the GSI influence on WLTC is already a consequence.	
B	No, demonstration should be done according to WLTC.	
C	Other	

RESULT: Italy supports solution A. The Netherlands and the UK support solution C. The Netherlands: When the vehicle is approved according to WLTP, the GSI has been covered by the RDE, unless it is concerning the RDE-monitoring stage. The UK agrees with this solution with the same remarks as the Netherlands. > There is consensus on solution C.

1.8

Questions by the TAAM delegation of Belgium
MOW-TAAM-2018-01

Subject:

Conditioned vehicles

Directive or Regulation number:

Regulation (EU) 1230/2012
Directive 2007/46/EC
Directive 96/53/EC

Relevant sections:

- ***Regulation 1230/2012***
  Annex I – Technical requirements – Part C & D

  1. Maximum authorised dimensions
  […]
  1.1.2. Width:
  (a) 2,55 m for any vehicle;
  (b) 2,60 m for vehicles fitted with a bodywork with insulated walls of at least 45 mm thick, as referred to in Appendix 2 to Annex II to Directive 2007/46/EC;
  […]

- ***Directive 2007/46/EC***
  Annex II, appendix 2 - Digits used to supplement the codes to be used for various kinds of bodywork

  […]
  04 Conditioned body with insulated walls and equipment to maintain the interior temperature; 05 Conditioned body with insulated walls but without equipment to maintain the interior temperature;
  […]
  11 Tank;
  12 Tank intended for transport of dangerous goods;
  […]

- ***Directive 96/53/EC***
  Article 2
  - 'conditoned vehicle' shall mean any vehicle whose fixed or movable superstructures are specially equipped for the carriage of goods at controlled temperatures and whose side walls, inclusive of insulation, are each at least 45 mm thick,

  Annex I – Maximum weights and dimensions and related characteristics of vehicles
  […]
  1.2 Maximum width:
  […]
  (b) superstructures of conditioned vehicles or conditioned containers or swap bodies transported by vehicles: 2,60 m

Question / discussion:

1 Which walls have to be insulated allowing a maximum width of 2,60m ?

	Suggested answers:	Accepted	Refused
A	All	X	
B	The two side walls		X
C	All, except the rear end (e.g. rear door, tailgate,…)		X

2 Does the maximum authorized width of 2,60m also applies to tanks with insulated walls?

	Suggested answers:	Accepted	Refused
A	Yes, a tank with insulated walls can have a maximum authorized width of 2,60m and the bodywork code will be supplemented with the digits 04 or 05.		X
B	No. The bodywork code of a tank has to be supplemented with the digits 11 or 12, but Regulation 1230/2012 only refers to vehicles with digits 04 or 05 to allow a maximum authorized width of 2,60m.	X	

3 Does the definition of 'conditioned vehicle' in Directive 96/53/EC applies both to vehicles with digits 04 and 05 (with and without equipment to maintain the interior temperature)?

	Suggested answers:	Accepted	Refused
A	Yes	X	
B	No, it only applies to vehicles with equipment to maintain the interior temperature (digit 04).		X

RESULTS -1, -2 and -3: The Netherlands will share an e-mail on this subject from Antony Lagrange of the EU Commission. Germany indicates that there is no clear definition in 1230/2012. Belgium replies that the definition of conditioned vehicles means: controlled temperature. Hot asphalt is not transported under controlled temperature and therefore does not fall under this definition. > No consensus is reached. It is decided that Belgium will forward these questions to the TAAEG.

1.9

Questions by the TAAM delegation of Belgium
MOW-TAAM-2018-02

Subject:

Motor-Caravan (SA)

Directive or Regulation number:

Directive 2007/46/EC

Relevant sections:

- ***Directive 2007/46/EC***
  Annex II, PART A, pt 5.1:

  Definition 'Motor-Caravan' (SA):
  A vehicle of category M with living accommodation space which contains the following equipment as a minimum:
  (a) seats and table;
  (b) sleeping accommodation which may be converted from the seats;
  (c) cooking facilities;
  (d) storage facilities.
  This equipment shall be rigidly fixed to the living compartment. However, the table may be designed to be easily removable.

- ***Directive 2007/46/EC***
  Annex II, PART A, pt 1.1:

  Definition 'Category M':
  Motor vehicles designed and constructed primarily for the carriage of persons and their luggage.

- ***Directive 2007/46/EC***
  Annex II, PART C, pt 3.1:

  Definition 'Lorry' (BA):
  A vehicle which is designed and constructed exclusively or principally for conveying goods. It may also tow a trailer.

Question / discussion:

1 Are there any requirements (minimum height, volume?) for the 'living accommodation space'?

	Suggested answers:	**Accepted**	**Refused**
A	Yes. However, a clarification of the 'living accommodation space' is necessary (TAAEG?).	X	
B	No, type-approval as motor-caravan is possible, regardless the volume or height of the living accommodation space.		X

2 Is a conversion lorry (BA) -> motor-caravan (SA) allowed, even if the motor-caravan has a significant cargo area (e.g. cargo area for horses)? Example: see pictures.

	Suggested answers:	Accepted	Refused
A	Yes.		X
B	Yes. However, a clarification of the 'living accommodation space' is necessary (TAAEG?).	X	
C	No conversion possible. This would be contrary to the definition of 'Category M'.		X

RESULTS -1 and -2: Discussion about the tax incentives connected to motorhomes in various countries versus type-approval definitions which are not in line with each other. The Netherlands: the vehicle must be a category M1. Question is whether this conversion is acceptable or not? Can this vehicle be considered a motorhome and should it then be equipped with ABS, etc., or not? France wonders if this conversion to another category is actually possible and judges that it should be a case by case decision. Germany agrees with this standpoint. The solution should be pragmatic. Question 1: Belgium supports solution 1.A. Austria, Belgium, Romania and Norway support solution 1.A. France, Germany, the Netherlands and Switzerland support solution 1.B. Question 2: Norway supports solution 2.C but also believes that a case by case decision could be acceptable. France, Germany, the Netherlands and Switzerland support solution 2.A. Austria, Belgium and Romania support solution 2.B, and France and Norway support solution 2.C.
> There is a need for a clear definition of a 'living accommodation space'. Belgium will take the initiative to discuss this on a federal level and bring it to The Commission for an implementing act.

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-2018-03

v2.00 –March 2018

Directive or Regulation number:
715/2007 - 2017/1151
Subject:
Odometer tampering

Reference to Annex, etc. in the Directive or Regulation:
2017/1151 Annex I paragraph 2.3.3.

Text:
2.3.3. Manufacturers shall effectively deter reprogramming of the odometer readings, in the board network, in any powertrain controller as well as in the transmitting unit for remote data exchange if applicable. Manufacturers shall include systematic tamper-protection strategies and write-protect features to protect the integrity of the odometer reading. Methods giving an adequate level of tamper protection shall be approved by the approval authority

Question:
What specific requirements do you currently apply to meet this particular requirement ?!

Solutions	
A	no specific requirements
B	statement from manufacturer
C	other

Possible decision:		
Solution	*Accepted*	*Refused*
A		X
B	X	
C	X	

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

Remarks:
The presence of the odometer has recently been added to the requirements of ECE R39, introduced by ECE R39.01 So vehicle types approved under ECE R39.01 are certainly equipped with an odometer; vehicle types approved before 1st of September 2017 under ECE R39.00 usually are. Approvals acc. to ECE R39.00 remain valid. Under ECE R39.01, no requirements apply with regard to the accuracy of the odometer. It seems strange to apply requirements to prevent tampering of odometer readings while its presence is not mandated and no accuracy requirements are in place. RDW has accepted a statement from the manufacturer and includes it in the 2017/1151 WLTP test report in which the manufacturer declares to comply with the requirements as stated in section 2.3.3. RDW is seeking consensus on this subject as to what is considered “adequate”.

RESULT: The Netherlands: there is no requirement for the accuracy of the odometer. B is our current approach but we are open for other solutions. Many agree with this standpoint. Germany also agrees but wonders what anti-tampering measures are taken. What is installed to prevent manipulation? A statement that it functions correctly is not sufficient, there should also be an explanation of how the mileage is stored in different devices. Belgium, France, Germany, Ireland, Luxembourg, the Netherlands, the UK and Switzerland support solution B.
> There is consensus on solution B.

Netherlands 9

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-2018-09

v2.00 –March 2018

Directive or Regulation number:
715/2007 – 2017/1151
Subject:
Extrapolation of 3 [g/km]

Reference to Annex, etc. in the Directive or Regulation:
2017/1151 Annex 21 sub-Annex 6 paragraph 1.2.3.2.

Text:
At the request of the manufacturer and with approval of the approval authority, the interpolation line may be extrapolated to a maximum of 3 [g/km] above the CO_2 emission of vehicle H and/or below the CO_2 emission of vehicle L. This extension is valid only within the absolute boundaries of the interpolation range specified above

Question:
Does the approval certificate have to be updated to make use of this possibility !?

Solutions:	
A	No, since the actual VL and VH do not change. The extrapolation is only visible on the COC, where a higher CO_2 number is given for and individual vehicle than VH (or lower than VL). The data on the COC and the correctness thereof are under supervision of the Type Approval Authority who granted the type approval. Other member states must be able to rely on the correctness thereof.
B	Yes

Possible decision:		
Solution	*Accepted*	*Refused*
A	X	
B		X

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

Remarks:
This question was also discussed during the last TAAM in Finland. See item 7.6 – France 5 of the Minutes. Also this item was briefly discussed during the TAAEG in Brussels, 8 February 2018. Since the actual VL and VH do not change; also the related CO_2 values do not change. There may be several IP families within a road load family due to the IP boundary conditions and thus several emission approvals. The starting point shall always be that one Energy Demand can only have one CO_2 value connected to it whereby cherry picking shall be prevented. This is something the TAA has to check and approve, but will only be visible in the individual CO_2 values on the COC.

RESULT: After a phone call, Germany decides to support solution B. France, Italy, the Netherlands and the UK support solution A, Romania supports solution B.
> No clear consensus is reached over the subject. The Netherlands will discuss the subject within RDW and then bring it to the WLTP meetings.

1.12

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VEHICLE CERTIFICATION AGENCY

THE UNITED KINGDOM VEHICLE APPROVAL AUTHORITY

TAAM Netherlands 2018 - United Kingdom

Regulation or Directive Number: EC 2007/46

Subject: Whole Vehicle Framework Directive

Legislation – Type Approval Certificate Template

Annex VI, Model A:

Side 1:

SECTION II
The undersigned hereby certifies the accuracy of the manufacturer's description in the attached information document of the vehicle(s) described above ((a) sample(s) having been selected by the EC type-approval authority and submitted by the manufacturer as prototype(s) of the vehicle type) and that the attached test results are applicable to the vehicle type.

1. For complete and completed vehicles/variants [(1)]:

The vehicle type meets/does not meet [(1)] the technical requirements of all the relevant regulatory acts as prescribed in Annex IV and Annex XI [(1)] [(4)] to Directive 2007/46/EC.

Where:
[(1)] Delete where not applicable
[(4)] See Side 2

Side 2:

In the case of special purpose vehicles, exemptions granted or special provisions applied pursuant to Annex XI and exemptions granted pursuant to Article 20:

Regulatory act reference	Item number	Kind of approval and nature of exemption	Applicable to variant or, if need be, to version

Background

Certain Special Purpose vehicles such as Taxis and Ambulances may have local requirements as part of the tender process for their sale. It is possible that a Taxi for registration in one city is required to meet the full requirements of Annex IV because the authorities do not want any derogations applied. Similarly if this vehicle has a wheelchair space then another city may require this to be a Special Purpose vehicle per Annex XI and be designated M1 SH. If you can meet the full requirements of Annex IV and in addition comply with the special provisions for Annex XI can you hold an approval to both routes?

The proposal would be to leave the whole reference on the certificate:

"The vehicle type meets the technical requirements of all the relevant regulatory acts as prescribed in Annex IV and Annex XI [(4)] to Directive 2007/46/EC."

The table on side 2 would be left blank as no derogations will have been applied.

Questions

1. **Can you be approved to both Annex IV and Annex XI if you meet the requirements of both Annexes?**

Suggested Answers

Type approving authority "e"	11
A. Yes	
B. No	

2. **What should the Vehicle Category be for an M1 SH approved to both Annexes (ie: entry on the C.O.C.)?**

Suggested Answers

Type approving authority "e"	11
A. Only M1 SH	
B. Both M1 and M1 SH (principle stablished in Bus & Coach for two classes of vehicle)	
C. Only M1	

3. **If the answer to Question 2 is B, do any member states foresee any registration issues?**

Suggested Answers

Type approving authority "e"	11
A. Yes	
B. No	

RESULTS -1, -2 and -3: One TVV can only be approved to Annex. WAV must meet Annex XI. You can have different TVV's approved to either Annex IV or Annex XI within one WVTA. Italy and the UK support solution 1-A, France, Germany and Spain solution 1-B, The Netherlands solution 2-A and the UK solution 2-B.
> After discussion, there is consensus on Question 1-B (No), Question 2-A (Only M1 SH) and Question 3: (Not applicable).

1.13

Vehicle Certification Agency

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THE UNITED KINGDOM VEHICLE APPROVAL AUTHORITY

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TAAM Netherlands 2018 - United Kingdom

Regulation or Directive Number: 715/2007 and 2017/1151

Subject: Selection of Road Load runs

Legislation

4.3.1.4.3. If during a measurement in one direction any external factor or driver action occurs that influences the road load test, that measurement and the corresponding measurement in the opposite direction shall be rejected.

The maximum number of pairs that still fulfil the statistical accuracy as defined in paragraph 4.3.1.4.2. shall be evaluated and the number of rejected pairs of measurement shall not exceed 1/3 of the total number of measurement pairs.

Questions

1. What are valid reasons for a run to be classed as rejected and therefore excluded from the statistical analysis?
2. Which type of rejected runs count towards the 1/3 that can be rejected?

Suggested Answers

Type approving authority "e"	11	
Question	**1**	**2**
Weather invalidates the run, i.e. cross wind		
Outside interference, i.e. overtaken by another vehicle		
Error with measurement, i.e. not all data collected, false trigger		
In order to bring the dataset into statistical accuracy, i.e. the run is valid in its own right		
In order to improve the result, i.e. run has a higher road load result		
Other reasons?		

RESULTS -1 and -2: Reaching consensus appears to be difficult because there are different view points. Germany believes that the first 3 elements of the 1st column of the table should not be taken into account for the statistics. France considers that some statements are unclear. The Netherlands considers that only the 3th element of the table (Error with measurement) should not be taken into account, while the rest should. However, The Netherlands believe that all items are important and are a possible reason for rejection. Germany finds it difficult to decide when to reject something on a statistical basis. Belgium chooses items 1, 2, 3 and 4 of the first column and items 2 and 3 of the second column to be reasons for rejection. Italy judges that all items are relevant and gives for 'other reasons' (item F) the example of 'driver action'. France: agrees with the standpoint of Italy; all items, except item 5 (In order to improve the result, i.e. run has a higher road load result') are reason for rejection. The Netherlands: all items except the 3rd item in the second column are reason for rejection.
> No clear consensus is reached. It is decided that the UK will bring up the subject to the the WLTP Working Group for further discussion.

1.14

NSAI Certification

TAAM Netherlands 2018 - Ireland

e24 NSAI Q3

Background:

The in-service conformity (ISC) requirements of 2017/1151 are those specified within paragraph 9 and Appendices 3, 4 and 5 of UN-ECE R83 with the exceptions contained within annex II of 2017/1151.
Vehicles are selected based on mileage and age: *The vehicle shall have been in service for at least 15,000 km or 6 months, whichever is the later, and for no more than 100,000 km or 5 years, whichever is the sooner.*

When the 4th RDE package comes into force, the current version of the ISC text has the granting type-approval authority (GTAA) in a much more active role with regard to ISC, and they will be involved in all stages of ISC.

- The current version of the ISC text will require the GTAA to be involved in the selection of vehicles representative of the ISC families.
- The frequency of testing will be based on a risk assessment methodology (as per ISO 31000:2009).
- The information gathered shall be sufficiently comprehensive to ensure that in-service performance can be assessed for vehicles that were used under normal conditions.
- Sample sizes shall be based on sales volumes in the Union per calendar year.

Questions:

1. How do you see this operating?

2. How to ensure a selection of vehicles covering the entire 15,000 to 100,000km range?

3. Should technical services involved in the emission type approval testing carryout the ISC tests for vehicles covered by these approvals? (Conflict of interest etc.,)

4. Should all laboratories carrying out ISC testing be accredited to ISO17025?

RESULTS -1 and -2: The Netherlands: for questions 1 and 2 it is our opinion that it should be further discussed within the TAAM sub-group on Emissions. A possible date could be in September 2018 (Note Secretary: Meeting will be held on October 11th in Flensburg.)
RESULTS -3 and -4: General opinion is that the type-approval should arrange for this. The situation should be considered case by case. There is a subgroup for emissions. These questions are useful for discussion within this group. Germany however wants to solve the issue now or in another meeting very soon, for example in the TAAM sub-group meeting, with only the experts of this subject. There should be an in-depth discussion. Any input is welcome from the participants. Ireland agrees with this idea. > Arrangements will be made after this meeting.

NSAI Certification

TAAM Netherlands 2018 - Ireland

Commission Roadmap for handling the transfer of UK EU approvals e24-NSAI-Q2

Background:

Commission's "Roadmap" proposal for transferring UK EU approvals post Brexit into an EU-27 approval. Available at: http://ec.europa.eu/info/law/better-regulation/initiatives/Ares-2018-2236797

In order to ensure the continued compliance with EU law by manufacturers holding type approvals issued by the UK, the Commission's proposal aims to allow the transfer of UK issued approvals into an EU-27 issued approval.

The proposal intends:

- To allow the manufacturers with UK type approvals to apply with the approval authority of an EU-27 Member State for new type-approvals for the same types already in production.
- To allow type-approving against requirements new vehicles need to meet for registration and not against requirements new types have to meet.
- To allow, where tested requirements have not changed, reusing existing test reports for the new applications regardless of whether the technical service in question has been previously designated and notified by the Member State to whom the new type-approval authority belongs.
- To ensure full responsibility of EU-27 type approval authorities for the new approvals they have issued.
- To ensure full responsibility for in-service conformity and conformity of production for vehicles and products already on the market under the UK type-approval.

The proposal will result in a targeted stand-alone regulation that will complement the existing type-approval legislation and will be limited in time.

Questions:

Based on the proposal a number of questions come to mind as follows:

- Do approval authorities have concerns transferring UK approvals without the usual oversight that is applied by approval authorities?
- Do you think it is possible for an EU-27 approval authority to take responsibility for the IUC and COP of vehicles and products already on the market under the UK approval prior to Brexit?
- Approval authorities grant approvals based on the testing carried out by the technical services they have designated. For UK approvals this proposal aims to change this by requiring approval authorities to accept test reports from a technical service they may not have designated. Consequently do approval authorities have concerns over this?
    - For the technical services involved with the UK approval, should EU-27 approval authorities require confirmation of the compliance of this technical service with the 2007/46/EC technical service requirements as a prerequisite for granting the approval?

- Most likely manufacturers with UK approval will make direct application to the EU-27 approval authority for transfer of their UK approval. As a minimum what information should they provide:
  - Previous UK approval including extensions?
  - All test reports associated with the UK approval including extesnions?
  - All manufacturers' documentation?
  - Quality system information:
    - ISO 9000 certificates?
    - Initial assessment audit reports?
    - COP reports?
    - Anything else?

These are some of the questions NSAI is considering, there may well be other questions other approval authorities have in mind and this would be a welcome opportunity to begin a discussion on this topic.

Attachments:

- EU Roadmap.

RESULTS -1, -2, -3 and -4: The Netherlands: RDW is very positive about the standpoint of the Commission, because of its pragmatic approach. VCA can issue type-approvals and there is no doubt about the validity. RDW further explains the situation and underlines that they will make an initial assessment on the COP and will in due course request for more information. Various topics are being discussed, such as e.g. specific issues not mentioned before by Ireland, application dates and End of Series applications. France remarks that TAAM is not the right place to discuss these issues and the standpoint of the Commission. The UK: The aim is to support the manufacturers as good as possible and to make the transition as seamless as possible. > Will be discussed on a later date.

Ref. Ares(2018)2236797 - 26/04/2018

European Commission

ROADMAP	
Roadmaps aim to inform citizens and stakeholders about the Commission's work to allow them to provide feedback and to participate effectively in future consultation activities. Citizens and stakeholders are in particular invited to provide views on the Commission's understanding of the problem and possible solutions and to share any relevant information that they may have.	
TITLE OF THE INITIATIVE	Regulation complementing EU type-approval legislation with regard to the UK withdrawal from the European Union (Brexit preparedness)
LEAD DG – RESPONSIBLE UNIT	GROW-C4
LIKELY TYPE OF INITIATIVE	Regulation
INDICATIVE PLANNING	May 2018
ADDITIONAL INFORMATION	http://ec.europa.eu/growth/sectors/automotive/technical-harmonisation/eu_en
This Roadmap is provided for information purposes only. It does not prejudge the final decision of the Commission on whether this initiative will be pursued or on its final content. All elements of the initiative described by the Roadmap, including its timing, are subject to change.	

A. Context, problem definition and subsidiarity check

Context

The European legislation foresees that a type-approval needs to be issued for the placing on the market of vehicles, systems, components and separate technical units as provided in

- Directive 2007/46/EC concerning the type-approvals of motor vehicles and trailers (to be replaced by a Regulation which will be applicable as from 1 September 2020);
- Regulation (EU) No 167/2013 concerning the type-approval of two- and three-wheeled vehicles and quadricycles;
- Regulation (EU) No 168/2013 concerning the type-approval of agricultural and forestry vehicles; and
- Regulation (EU) 2016/1628 concerning the type-approval of engines for use in non-road mobile machinery.

The legislation relies on the recognition of type-approvals issued in one Member State throughout the Union. While manufacturers can choose the Member State where they apply for type approval, they are only allowed to apply for the approval of a particular type in one Member State to avoid type approval shopping. By issuing a type approval, an EU type-approval authority also becomes responsible for ensuring conformity of production and, for motor vehicles, in-service conformity under the type-approval.

The United Kingdom submitted on 29 March 2017 the notification of its intention to withdraw from the Union pursuant to Article 50 of the Treaty on European Union. This means that, unless a ratified withdrawal agreement establishes another date, all Union primary and secondary law will cease to apply to the United Kingdom from 30 March 2019, 00:00h (CET) ('the withdrawal date'). The United Kingdom will then become a 'third country'.

This means that as of the withdrawal date, the United Kingdom type approval authority will cease to be an EU type-approval authority and will no longer be able to fulfil any of the powers and obligations of a type-approval authority under EU legislation. Manufacturers who obtained approvals in the United Kingdom in the past will need new approvals from EU-27 type approval authorities, including for products already in production, in order to ensure continued compliance with EU law.

Significant legal uncertainty has been identified in this context, which this initiative aims to address.

Problem the initiative aims to tackle

The following problems have been identified in ensuring the continued compliance with EU law after the UK withdrawal by manufacturers holding type-approvals issued by the United Kingdom type approval authority:

- The existing type approval legislation does not allow manufacturers to apply for the approval of the same type in more than one Member State, hence hindering the replacement of type-approvals issued by the United Kingdom by type approvals issued by EU-27 type approval authorities;
- Existing test reports may only be (re-)used if they have been issued by technical services which had previously been notified and designated by the EU-27 Member State whose approval authority intends to use it;

- From the date of withdrawal, United Kingdom technical services will be regarded as technical services of third countries, which under current provisions may only be notified in the framework of a bilateral agreement between the Union and the third country in question;
- New applications for type-approvals under current provisions need to comply with the requirements for new types. For example, in the case of motor vehicles, the requirements of eCall are mandatory for all new types being type-approved as of 1 April 2018, but are not mandatory for all newly registered vehicles under existing type-approvals. Having to meet these new type requirements may thus seriously disadvantage manufacturers who chose the United Kingdom for their type approval compared to those who hold an EU-27 type approval, since the latter will only need to meet new vehicle requirements for their types already in production;
- Finally, once the United Kingdom type-approval authority has ceased to be an EU type-approval authority, it can no longer ensure the conformity of production and in service conformity of products already in circulation. A responsible type-approval authority is also needed for the recall of a product that is not in conformity with safety or environmental requirements.

The aim of the initiative is to tackle these issues to facilitate continued compliance with EU law by manufacturers having obtained type-approvals in the United Kingdom and ensure a level playing field between them and manufacturers having obtained a type-approval in the EU-27.

Basis for EU intervention (legal basis and subsidiarity check)

The legal basis is Article 114 of the Treaty on the Functioning of the European Union.

The type-approval legislation at present is harmonised at EU-level. As a consequence, it can only be modified by another act adopted by the co-legislators. The Member States have no means of achieving the same result or addressing the problem without action by the Union. Therefore, this initiative fully respects the principle of subsidiarity.

B. What does the initiative aim to achieve and how

The present initiative aims to ensure continued compliance with EU law by manufacturers holding type-approvals issued by the United Kingdom type-approval authority by addressing the identified problems above as follows:

- ***'Re-issue' of type-approval:*** The proposal intends to allow manufacturers with type-approvals issued by the United Kingdom to apply with the type-approval authority of an EU-27 Member State for new type-approvals for the same types already in production;
- ***Test reports:*** The proposal intends to allow, where the tested requirements have not changed, reusing existing test reports for the new applications regardless of whether the technical service in question has been previously designated and notified by the Member State to whom the new type-approval authority belongs;
- ***New requirements:*** The proposal intends to allow type-approving against requirements all new vehicles need to meet for registration and not against the requirements which all newly approved models (types) have to meet. This creates a level playing field between manufacturers holding a United Kingdom type approval and those already holding EU-27 approvals. These manufacturers must equally adapt their ongoing production to comply with new vehicle requirement;
- ***Conformity of production and in-service conformity:*** Finally, the proposal intends to ensure full responsibility of EU-27 type-approval authorities for the new approvals they have issued, and also obligations for in-service conformity and conformity of production for vehicles (products) already on the market under the United Kingdom type-approval.

The initiative is based on a careful legal analysis of the type-approval legislation, which identified the measures above as the only option for addressing the legal uncertainty associated with the problems listed above. The initiative will take the form of a targeted stand-alone regulation that will complement the existing type-approval legislation. The initiative will be limited in time.

As regards impacts, the modifications proposed in this initiative will not lower the requirements regarding the safety or environmental performance of the vehicles, systems, components or separate technical units in production. It will not grant any advantages to manufacturers with UK type-approvals, compared to manufacturers with EU-27 type-approvals. On the contrary, the initiative will simply allow manufacturers to continue producing their products in compliance with applicable legal requirements without interrupting their existing production, which could have caused significant social and economic impacts. In facilitating manufacturers' compliance with EU law, the initiative will also ensure the protection of consumers and citizens.

C. Better regulation
Consultation of citizens and stakeholders
The challenges arising for type-approval from the United Kingdom's withdrawal from the EU were raised and discussed at several meetings with Member States and brought to the attention of the Commission by manufacturers and the associations representing them. The general public and interested parties will be able to provide feedback on this roadmap as well as on the adopted proposal.
Evidence base and data collection
– Oral and written feedback from manufacturers and Member States, see above. – A legal analysis of the type-approval legislation underpinning two notices to stakeholders: Guidance to stakeholders on impact on type-approval of motor vehicles of 8 February 2018 and Guidance to stakeholders on impact on type-approval of certain vehicles and engines of 28 March 2018.

NSAI Certification

TAAM Netherlands 2018 - Ireland

Draft Framework Regulation: Technical Service Designation Process e24 NSAI Q1

NSAI is receiving a lot of questions from technical services concerning the designation process of technical services within the draft Framework Regulation, as yet unpublished. As a result we have put together below, a summation of what we believe are the salient points, with questions for discussion in TAAM. The objective is to begin a discussion which will result in a common understanding between all approval authorities.

Technical service requirements are covered from Article 68 to 81 of the draft Framework Regulation. This paper is considering Articles 73 and 74 mostly.

Technical services designated before the date of entry into force of the new Framework Regulation shall be subject to the assessment referred to in Article 73. Their designation shall be renewed no later than four years after the date of entry into force of the new Framework Regulation.

Under the draft Regulation, the type-approval authority decides which route to designation the applicant technical service is to follow:

- The accreditation route to designation or
- The approval authority joint assessment route to designation.

<u>The accreditation route to designation</u>:

- After initial contact with the type-approval authority and being advised by the type-approval authority to follow the accreditation route for designation, the applicant technical service shall contact the accreditation body in the Member State the applicant technical service resides, for accreditation covering the scope of designation requested.

- The national accreditation body shall:
  - Assess the application in accordance with an assessment check-list that covers at least the requirements laid down in Appendix 2 to Annex III.
  - Carry out an on-site assessment of the applicant technical service's premises and, where relevant, of any subsidiary or sub-contractor whether located inside or outside the Union.

- When accredited the applicant technical service will then deliver to the type-approval authority the valid accreditation certificate and the corresponding assessment report indicating compliance of the applicant technical service for the category (ies) of activities it is applying to be designated for.

- A technical service may be designated by one or more type-approval authorities of Member States other than the Member State of its establishment, provided that the entire scope of its

Designation is covered by an accreditation issued in accordance with article 73(3), or by an assessment carried out in accordance with article 73(4).

Questions: Accreditation Route to Designation	**Agree**	**Disagree**
1. It is up to the type-approval authority receiving the application for designation to decide which route to designation is to apply (accreditation route or joint assessment route).		
2. The national accreditation body in the Member State in which the applicant technical service is resident in, conducts the assessment; regardless of whichever type-approval authority the applicant technical service has applied for designation from.		
3. The type-approval authority is not required to undertake an on-site assessment of the applicant technical service where the accreditation route is used.		
4. The approval authority receiving the application for designation is not acting on behalf of the applicant technical service with the national accreditation body.		
5. Until the national accreditation body has completed its assessment and has issued the accreditation, there is no further involvement by the approval authority in the process.		
6. The requirement to appoint a Joint Assessment Team does not apply to the "accreditation route" for designation.		
7. The designating approval authority is not required to send to the Commission and the other type-approval authorities the valid accreditation certificate and corresponding assessment report issued by the national accreditation body.		

8. Where the applicant technical service requests designation by more than one type-approval authority, does: a. The applicant technical service apply to all type-approval authorities it wishes to be designated by? Or does	**Yes**	**No**
b. The applicant technical service apply to only one type-approval authority and that type-approval authority coordinates with the other type-approval authorities?	**Yes**	**No**

Draft Framework Regulation: **Technical Service Designation Process** **e24 NSAI Q1**

Approval authority joint assessment route to designation:

- The approval authority which receives the application for designation shall first assess it in accordance with an assessment check-list that covers at least the requirements laid down in Appendix 2 to Annex III.

- The assessment shall include an on-site assessment in the premises of the applicant technical service, and, where relevant of any subsidiary or sub-contractor, whether located inside or outside the Union.

- The approval authority which receives the application for designation shall appoint a Joint Assessment Team to conduct the assessment. This applies to technical services applying for designation to provide testing for:
    - EU Whole Vehicle Type Approval.
    - EU Small Series Type Approval.
    - EU Multi-Stage Type Approval.
    - EU Individual Vehicle Approval.
    - EU Separate Technical Unit Type Approval.
    - EU Component Type Approval.
    - UN-ECE approvals recognised by the EU as being equivalent?
    - Any combination of the above?

- For technical services that apply for designation exclusively for national individual vehicle approvals, the appointment of a Joint Assessment Team is not required.

- A technical service may be designated by one or more type-approval authorities of Member States other than the Member State of its establishment, provided that the entire scope of its designation is covered by an accreditation issued in accordance with article 73(3), or by an assessment carried out in accordance with article 73(4).

- The Joint assessment team shall participate in all aspects of the assessment including the on-site assessment and where relevant, any subsidiary or sub-contractor, whether located inside or outside the Union?

- The Joint Assessment Team shall raise findings regarding non-compliances found.

- The Joint Assessment Team shall produce a report setting out its findings and recommendation for designation or not.

- The type approval authority which received the application for designation shall send to the Commission a report on the outcome of the assessment, including documentary evidence

regarding the competence of the applicant technical service and the arrangements put in place by the type approval authority to regularly monitor the technical service.

- The Commission and the type-approval authorities of the other Member States may review the assessment report and documentary evidence, raise questions or concerns and request further documentary evidence within one month from date of receipt of the report.

- The type-approval authority which received the technical service designation application shall respond to questions, concerns and requests for further evidence within four weeks following their receipt.

- Within four weeks following the receipt of the response from the type-approval authority which received the technical service designation application, the type-approval authorities of the other Member States or the Commission may individually or jointly address recommendations to the type-approval authority which received the application for designation.

- That type-approval authority shall take account of the recommendations it receives when it takes the decision on the designation of the technical service.

- Where the type approval authority decides not to follow the recommendations received, it shall give the reasons therefor within two weeks after taking its decision.

No further prescriptions after this.

Questions: **Joint Assessment Route to Designation**	**Agree**	**Disagree**
1. The time-frame from issuing the assessment report to the decision to designate the applicant technical service can be up to three months, coupled with the organisation and coordination of a Joint Assessment Team, the need for translation services for the Team, preparation of reports etc., would appear to make this route to designation more onerous to applicant technical services and type-approval authorities. Consequently, we believe that the only practicable route to designation for technical services is by means of accreditation.		
2. There is no predefined way; no set means of communication, report forms, contact points etc., to be used by the type-approval authority when formally appointing the Joint Assessment Team and carrying out the assessment.		
3. This process seems incomplete. There are no further prescriptions to follow if the type-approval authority decides not to follow the recommendations received from the Commission and the other approval authorities. As a result can type-approval authorities ignore any recommendations if they consider they will have little or no effect on the designation?	**Yes**	**No**

Accreditation Route to Designation:
RESULT -1: Spain: we see no reason for two different routes. The UK: we have questions with regard to multiple parts. France, Ireland, the Netherlands and Spain agree. Germany comments that both routes can be considered to be judged by the Technical Service.
> Consensus on Agree.
RESULTS -2, -3, -4, -5, -6 and -7: France, Ireland, the Netherlands and Spain agree with the exception that Spain disagrees with questions -3 and -5, stating that if TS has ISO 17025, a more relaxed procedure applies but no automatic accreditation.
> Consensus on Agree with two exceptions.
RESULTS -8a and -8b: > Standpoint of France, Ireland and the Netherlands: for question 8a: Yes, for question -8b: No.

Joint Assessment Route to Designation:
RESULT -1: Ireland Agrees with this standpoint. The Netherlands has no conclusive answer. > No consensus.
RESULTS -2 and -3: Ireland agrees with this standpoint. The Netherlands disagree. This is already included in the new framework directive. > No consensus.

Part 2.

167/2013/EU

TAAM QUESTION, Utrecht

COUNTRY: Finland

QUESTION NR.: 1

SUBJECT: Repair and maintenance information requirement entering into force **(EU) No 1322/2014 (Annex V)**

REFERENCES (DIRECTIVE/ANNEX/ETC):

EU regulation 1322/2014, Framework regulation EU 167/2013

Regulation points:

4. Service parts, diagnostic tools and test equipment

4.1. In the context of Article 53 (6) of Regulation (EU) No 167/2013, the manufacturer shall make the following information available to interested parties on the basis of individual arrangements to which the principle of Article 55 of Regulation (EU) No 167/2013 apply and to provide contact details on its website:

4.1.2. information to enable the development of generic diagnostic tools as listed in Appendix 2.

4.4. Point 4.1.2 shall apply from 1.7.2021.

EU regulation 1322/2014, Annex V:

Interpretation:

According to legislation of repair and maintenance information implementation dates concerning diagnostic tools is unclear. It is not stated whether the date 1.7.2021 is the date for first registration or new vehicle type.

As we see the requirement, it's the date for first registration of a vehicle type-approved according to EU-regulation 167/2013. Manufacturer has given the certificate that the requirements for repair and maintenance information are fulfilled and this particular requirement enters into force on 1.7.2021 and has to be fulfilled after the date or the type-approval will no longer be valid.

QUESTIONS:

Do you agree our interpretation on this matter?

1. Please consider which of the following options you share:

		e17	
		Accepted	Rejected
A	Yes, requirement is for the first registration, text in the regulation is not clear and it has to be updated	**X**	
B	Yes, requirement is for the first registration, text in the regulation is clear		**X**
C	No, the requirement is for the new type, text in the regulation is not clear and it has to be updated		**X**
D	No, the requirement is for the new type, text in the regulation is clear		**X**

RESULT: The Netherlands: 'first registration' should be changed into 'first entered into the market'. Finland agrees. Finland, France, Italy and the Netherlands support solution A. France: we would prefer B but we can accept solution A. > There is consensus on solution A, including the remark by the Netherlands.

2.2

TAAM, Utrecht, Netherland (June 28 and 29, 2018) **Switzerland 2**

SUBJECT: Construction and fitting requirements

DIRECTIVE: Delegated Regulation (EU) 2015/68, annex I, subparagraph 2.1.5.2.

Background

This Regulation establishes the detailed technical requirements and test procedures regarding functional safety with respect to braking performance for the approval and market surveillance of agricultural and forestry vehicles and systems, components and separate technical units intended for such vehicles in accordance with Regulation (EU) No 167/2013.
Connections between tractors and towed vehicles with hydraulic braking systems.
The criteria to be met in order to fulfill the delegated regulation on the basis of examinations leaves, to our understanding, some scope of interpretation.

2.1.5.2. With the engine running and the parking braking system of the tractor fully applied:

2.1.5.2.1. a pressure of 0^{+100} kPa is present on the supplementary line and/or

2.1.5.2.2. a pressure between 11 500 kPa and 15 000 kPa is generated on the control line.

Major Concern

We have some uncertainties to understanding the term «and / or» (marked in yellow) in item 2.1.5.2.1. and to interpret it correctly. Therefore, we interpret section 2.1.5.2. as follows:
With the engine running (idling) and with fully applied parking brake, the following test values must be achieved:

- In the additional line, a pressure between 0 to ≤ 1 bar and in the control line a pressure between ≥ 115 to ≤ 150 bar

or

- In the additional line, a pressure between 15 to ≤ 35 bar and in the control line a pressure between ≥ 115 to ≤ 150 bar

Question

Is our interpretation of the item 2.1.5.2. correct?

	Possible Solution	accepted	not accepted
A	Yes	CH	
B	No … If the interpretation is not correct, please indicate the reasons		CH

RESULT: The Netherlands: when pressure on the supplement line is 0 – 1 bar, the brake system of the trailer must be applied. Therefore pressure in the control line is not required. When pressure in the supplement line is between 15 – 35 bar and in the control line 115 – 150 bar, the brakes of the trailer are fully applied. Pressure is required in both control lines. Italy: the issue is 'and/or'; we are in favour of solution B. The Netherlands and Germany support solution B. Switzerland agrees with solution B. > There is consensus on solution B.

Netherlands 13

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-2018-13

v2.00 –March 2018

Directive or Regulation number:
2015/68
Subject:
Hydraulic brake system agricultural trailer

Reference to Annex, etc in the Directive or Regulation:
Annex I: construction and fitting requirements vehicle category R and S

Text:
2.2.2.9. The braking system shall be such that the towed vehicle is stopped automatically if the coupling separates while the towed vehicle is in motion. … 2.2.2.12. On every towed vehicle which is fitted with a hydraulic service braking system the braking system shall be so designed such that when the supplementary line is disconnected the parking or service braking system shall be automatically applied. … 2.2.2.15. In addition to the above, towed vehicles with hydraulic braking systems shall comply with the following: 2.2.2.15.1.1. When the pressure in the hydraulic energy storage devices falls below a pressure declared by the vehicle manufacturer in the information folder where the prescribed braking performance(s) is (are) not ensured this low pressure shall be indicated to the driver by the separate warning signal specified in point 2.2.1.29.2.2 via pin 5 of the electrical connector conforming to ISO 7638:2003. This pressure shall not exceed 11 500 kPa

Question:
A system with the following characteristics is presented: When a trailer with a two line hydraulic brake system is coupled to a towing vehicle, the yellow warning signal conform 2.2.2.15.1.1. is activated in the towing vehicle. The signal indicates to the driver that the pressure in the hydraulic storage devices of the trailer is too low to ensure the prescribed braking performance in the situation prescribed in par. 2.2.2.9. This behaviour can occur every time a towing vehicle is coupled. The brake pedal of the towing vehicle must be applied first to produce enough brake pressure in the hydraulic storage devices of the trailer to de-activate the warning signal and to ensure par. 2.2.2.9. can be fulfilled. However it still possible to drive away with the combination and ignore the yellow warning light. Note, a yellow warning light generally indicates the driver to check the vehicle and not to stop the vehicle as soon as possible. Question: How should the paragraphs listed above be interpreted for the system behaviour prescribed ?

Solutions:	
A	If the warning signal (2.2.2.15.1.1.) is activated, the requirement of par. 2.2.2.9. is **temporarily not** actual. As long as the warning signal is active par. 2.2.2.9. does **not** have to be **fulfilled.**
B	As long as the warning signal (2.2.2.15.1.1.) is activated the requirement of par. 2.2.2.9. is **still** actual. Only the warning signal is not sufficient to fulfil the above listed requirements of annex I.

Possible decision:		
Solution	*Accepted*	*Refused*
A		**X**
B	X	

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

Remarks:
--

RESULT: The Netherlands: the amber warning signal is the problem. It is possible to start driving with the vehicle combination when the amber warning signal is activated, while the pressure in the hydraulic storage devices of the trailer is too low to ensure the braking performance in the situation prescribed in Par. 2.2.2.9. France and Italy support solution A. France: we can accept solution A. Germany: solution B is better but solution A is acceptable according to the regulation. The opinion is that the situation should actually be considered on a case by case basis (option C). > The majority is in favour of solution A.

2.4

Slovakia 1

Question by the TAAM delegation of the Slovakia

Directive or Regulation number:
EU Regulation 167/2013
Subject:
Classification of the category

Reference to Annex, etc in the Directive or Regulation:
Regulation (EU) 167/2013 – Article 3 (8)

Text:
Some manufacturer of quadricycles in the case if their vehicles don't fulfill requirement for categorized as L category would like to categorize these vehicles as T3 category (wheeled tractors) and to apply for an EC-type approval according to EU Regulation 167/2013. Some of these quadricycles don't have a coupling device and can't pull any agricultural or forestry trailers or equipment (the weight of the combination and weight for trailers is zero). The tractor approved of those process don't fulfill basic function according the Regulation (EU) 167/2013 – Article 3 (8). Definition in Regulation (EU) 167/2013 – Article 3 (8): 'tractor' means any motorised, wheeled or tracked agricultural or forestry vehicle having at least two axles and a maximum design speed of not less than 6 km/h, the main function of which lies in its tractive power and which has been especially designed to pull, push, carry and actuate certain interchangeable equipment designed to perform agricultural or forestry work, or to tow agricultural or forestry trailers or equipment; it may be adapted to carry a load in the context of agricultural or forestry work and/or may be equipped with one or more passenger seats; In our opinion, the upper mentioned vehicles is not possible categorized as T because this vehicles doesn't fulfill basic definition for T category and the vehicles still belong to L7e.

Question:
1. It is possible for such L7e category vehicles (quadricycles) to grant an EC-type approval according to EU Regulation 167/2013?

Solutions:	
1A	Yes, it is possible.
1B	No, it isn't.

Possible decision :		
Solution	Accepted	Refused
1A		X
1B	X	

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

RESULT: Italy is in favour of a new solution (1.C) because it should be considered on a case by case basis. Finland also agrees with 1.C. Romania is in favour of solution 1.B. This is to avoid the misuse of taxation rules by trying to transfer motorcycles to the category of agricultural vehicles, avoiding legal barriers. They are sometimes used in an agricultural role but Romania tries to block this. Germany also support solution 1.B but they agree with the viewpoint of Italy that it actually should be considered case by case. > The majority is in favour of solution 1.B but agrees with a case by case approach (1.C).

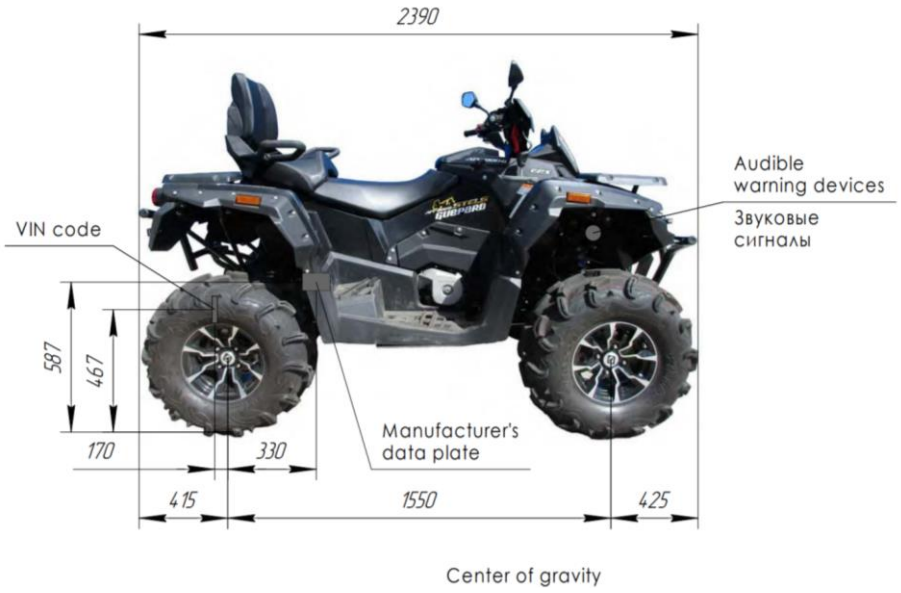


Figure 1

Figure 2

Figure 3

Figure 4

Part 3.

168/2013/EU

3.1

MINISTERIO DE ECONOMÍA, INDUSTRIA Y COMPETITIVIDAD

DIRECCIÓN GENERAL DE INDUSTRIA Y DE LA PEQUEÑA Y MEDIANA EMPRESA

SUBDIRECCIÓN GENERAL DE CALIDAD Y SEGURIDAD INDUSTRIAL

Type Approval Authority Meeting, Netherlands, June 2018 **Spain 1**

Directive or Regul ation number
Regulation (EU) No. 168/2013, Delegated Regulation (EU) No. 44/2014*2018/295 and Implementing Regulation (EU) No. 901/2014*2016/1825
Subject:
Installation of removable batteries into pure electric vehicles within the same type/variant/version (TVV) approved under Regulation (EU) No. 168/2013

Text:

Regulation (EU) No 168/2013, Article 3 (75):

(75) 'version of a variant' means a vehicle which consists of a combination of items shown in the information package referred to in Article 29(10)

Regulation (EU) No 44/2014*2018/295, Article 2 (25):

(25) 'optional equipment' means features that are not included in the standard equipment and may be fitted to a vehicle under the responsibility of the manufacturer;

Annex VIII of Regulation (EU) No 901/2014*2016/1825:

"Format of test reports and template for the test results sheet"

1.5.4. The information shall indicate the variant(s) and/or version(s) to which it applies. One version shall not have more than one test result. However, a combination of several test results per version, indicating the worst case, is permissible. In this case, a note shall state that for items marked (*) only worst-case results are given.

Annex IV of Regulation (EU) No 901/2014*2016/1825:

"Templates for the certificates of conformity"

0. Objectives

The certificate of conformity enables the competent authorities of the Member States to register vehicles without requiring the applicant to supply additional technical documentation. For these purposes, the certificate of conformity has to include:

(a) the vehicle identification number;

(b) the exact technical characteristics of the vehicle (e.g. it is not permitted to mention any range of value in the various entries).

Concern:

Manufacturers are producing EV where there is the possibility to fit one or more removable batteries depending on the range needs of the user.

This means that defining only one propulsion battery configuration, as required in the Delegated Acts, does not match with the possibility of flexible energy storage allowed by the possibility of easily combining battery packs.

Question:			
How should authorities and technical services deal the possibility to fit one or more removable batteries depending on the range needs of the user in the same TVV?			
Solution:		Accepted	Refused
A	For each battery configuration a new TVV shall be created.		
B	It is allowed to install flexible removable batteries in the same version in accordance to item 1.5.4 to Annex VIII of R(EU)901/2014, when indicating the worst case combination.		
C	Amend delegated acts, including COC, to handle flexible removable batteries on EV.		
D	Other.		
Authority:			
Type-approval Authority e/E 9			

RESULT: The Netherlands: if the range is different it is a test item. In the worst-case, the minimum range is acceptable. Spain considers between solutions A and B but chooses B. Many share the opinion of Spain and pragmatically support A although can accept B as well. Italy supports B. Germany has no experience with it. In case of C this changes the CoC. How do we handle the situation in case of more ranges? Spain: in that case we choose solution B. (in case of the largest range with the best possible battery combination). The Netherlands: In case of solution B, the worst-case applies (the smallest battery option). Both solution A and B are acceptable. The UK: Solution A is the correct solution. Germany: We choose for solution A like the UK. It is also possible to choose the worst-case. The pragmatic approach is solution B (lower value), but B is not the right way. Germany: the CoC should describe the vehicle as it is. The Netherlands: It is about the declared value for the range. We see no problem to indicate the lower range. Italy shares this opinion. > After some discussion it is decided that Spain will prepare the question to bring it to the TAAEG.

3.2

MINISTERIO DE ECONOMÍA, INDUSTRIA Y COMPETITIVIDAD

DIRECCIÓN GENERAL DE INDUSTRIA Y DE LA PEQUEÑA Y MEDIANA EMPRESA

SUBDIRECCIÓN GENERAL DE CALIDAD Y SEGURIDAD INDUSTRIAL

Type Approval Authority Meeting, Netherlands, June 2018 **Spain 2.1**

Directive or Regulation number
Regulation (EU) No 168/2013, Delegated Regulation (EU) No 44/2014*2018/295
Subject:
Electric vehicles state for dimensions measurements under Delegated Regulation (EU) No 44/2014*2018/295 Annex XI.

Text:
Regulation (EU) No 168/2013, Article 5 (2): *2. The **mass in running order** of an L-category vehicle shall **exclude** the mass of:* *(c) in the case of a hybrid or pure electric vehicle, the **propulsion batteries;*** **Regulation (EU) No 44/2014*2018/295 Annex XI appendix 1, clause 1– Vehicle dimensions:** *1.1.1. The vehicle shall be at its mass in running order, placed on a horizontal and flat surface with tyres inflated at the pressure recommended by the manufacturer;*
Concern:
Measuring the dimensions on EV in MRO conditions, without inclusion of the propulsion batteries, does not correspond to normal operation condition of the vehicle.

Question:			
In which mass condition should be measured the dimensions of electric vehicles under Regulation No (EU)44/2014*2018/295?			
Solution:		Accepted	Refused
A	Electric vehicle dimensions shall be measured in MRO condition plus propulsion batteries mass.		
B	Electric vehicle dimensions shall be measured in MRO condition only.		
Authority:			
Type-approval Authority e/E 9			

RESULT: Spain prefers solution A. Italy support solution A. The UK supports solution B according to the text of the solution. Germany: The batteries were excluded from the definition to promote the use of electric vehicles but the question is what to do if there are more batteries? Germany and Norway also support solution B. France prefers solution A because it stays close to the vehicle as it is. Norway: The same problem is the Mass in Running Order (MRO), can we change the definition? Spain: It would be logical to choose for solution B when we choose to remove the batteries from the definition. Can we agree to change the definition? The Netherlands: Our preferred solution is B. We understand the concerns but the definition is clear. The MRO should be measured without the batteries (including the dimensions). The UK also believes that the definition is clear. Germany: solution B is acceptable, the definition is clear, changing it would create more problems (about the number of batteries, etc.) > After discussion, solution B is accepted. The question whether or not the definition should be changed remains unanswered.

3.3

MINISTERIO DE ECONOMÍA, INDUSTRIA Y COMPETITIVIDAD

DIRECCIÓN GENERAL DE INDUSTRIA Y DE LA PEQUEÑA Y MEDIANA EMPRESA

SUBDIRECCIÓN GENERAL DE CALIDAD Y SEGURIDAD INDUSTRIAL

Type Approval Authority Meeting, Netherlands, June 2018 **Spain 2.2**

Directive or Regulation number
Regulation (EU) No 168/2013, Delegated Regulation (EU) No 44/2014*2018/295
Subject:
Permissible allowable tow mass for Electric vehicles under Delegated Regulation (EU) No 44/2014*2018/295 Annex XI.

Text:
Regulation (EU) No 168/2013, Article 5 (2): *2. The **mass in running order** of an L-category vehicle shall **exclude** the mass of:* *(c) in the case of a hybrid or pure electric vehicle, the **propulsion batteries;*** **Regulation (EU) No 44/2014*2018/295 Annex XI appendix 1, clause 2.5 – Tow mass:** *2.5. L-category vehicles can be authorised to tow a trailer ≤ 50 % of the **mass in running order** of the vehicle.*
Concern:
Having a permissible allowable tow mass up to 50 % of the MRO in electrical vehicles, may lead to a low tow mass compared to a combustion engine vehicle.

Question:			
Should the authorised tow mass be up to 50 % of the MRO plus propulsion batteries under Regulation (EU) No 44/2014*2018/295?			
Solution:		Accepted	Refused
A	Yes, for electric vehicles the authorized tow mass shall take into account MRO plus the propulsion batteries.		
B	No, for electric vehicles the authorized tow mass shall only take into account MRO.		
Authority:			
Type-approval Authority e/E 9			

RESULT: Spain and The Netherlands support solution B.
> There is consensus on solution B.

3.4

MINISTERIO DE ECONOMÍA, INDUSTRIA Y COMPETITIVIDAD

DIRECCIÓN GENERAL DE INDUSTRIA Y DE LA PEQUEÑA Y MEDIANA EMPRESA

SUBDIRECCIÓN GENERAL DE CALIDAD Y SEGURIDAD INDUSTRIAL

Type Approval Authority Meeting, Netherlands, June 2018 **Spain 2.3**

Directive or Regulation number
Regulation (EU) No 168/2013
Subject:
Power per weight ratio definition under Regulation (EU) No 168/2013 Annex I for electrical vehicles

Text:
Regulation (EU) No 168/2013, Annex I **(Sub-category: L3e-A1, Low-performance motorcycle):** *(9) power[(1)]/weight ratio ≤ 0,1 kW/kg* **(Sub-category: L3e-A2, Medium-performance motorcycle):** *(8) power[(1)]/weight ratio ≤ 0,2 kW/kg* **Regulation (EU) No 168/2013, Annex I (Explanatory notes to annexes I to VIII):** *([1]) The weight of a vehicle is considered equal to its mass in running order.* **Regulation (EU) No 168/2013, Article 5 (2):** *2. The **mass in running order** of an L-category vehicle shall **exclude** the mass of:* *(c) in the case of a hybrid or pure electric vehicle, the **propulsion batteries;***
Concern:
We understand that the aim of the power to mass ratio is to evaluate the performance level of the vehicles, and for that reason for EVs the mass of the propulsion batteries should be added to the mass in running order. (e.g. EV with 11kW to be classified as L3e-A1 shall have MRO more than 110kg)

Question:			
Should the explanatory note ([1]) to Annexes I to VIII to Regulation (EU) 168/2013 be updated to include also the propulsion batteries mass in case of electrical vehicles?			
Solution:		Accepted	Refused
A	Yes		
B	NO		
Authority:			
Type-approval Authority e/E 9			

RESULT: Spain supports solution B. The Netherlands: We believe that the definitions are clear. Spain: There is an inconsistency in the MRO, we can agree with solution B but it is not the way the regulation was intended. > There is consensus on solution B.

Part 4.

ECE

Trafi Finnish Transport Safety Agency

TAAM QUESTION, Utrecht

COUNTRY: Finland

QUESTION NR.: 2

SUBJECT: Definition of head restraint according to **UNECE Regulation No 17**

REFERENCES (DIRECTIVE/ANNEX/ETC):

UNECE regulation No. 17, Framework directive 2007/46/EC

Regulation points:

2.12. "*Head restraint*" means a device whose purpose is to limit the rearward displacement of an adult occupant's head in relation to his torso in order to reduce the danger of injury to the cervical vertebrae in the event of an accident;

2.12.1. "*Integrated head restraint*" means a head restraint formed by the upper part of the seat-back. Head restraints meeting the definitions of paragraphs 2.12.2. or 2.12.3. below but which can only be detached from the seat or the vehicle structure by the use of tools or by partial or complete removal of the seat covering, meet the present definition;

2.12.2. "*Detachable head restraint*" means a head restraint consisting of a component separable from the seat designed for insertion and positive retention in the seat-back structure;

2.12.3. "*Separate head restraint*" means a head restraint consisting of a component separate from the seat, designed for insertion and/or positive retention in the structure of the vehicle

5.9. In the case of head restraints integral with the seat-back, the area to be considered is: Above a plane perpendicular to the reference line at 540 mm from the R point. Between two vertical longitudinal planes passing at 85 mm on either side of the reference line. In this area, one or more gaps which regardless of their shape can show a distance "a" of more than 60 mm when measured as described in paragraph 6.7. below, are permitted provided that, after the additional test under paragraph 6.4.3.3.2. below, the requirements of paragraph 5.12. below are still met.

Interpretation:

In vehicles of category for example N_3 and M_3 head restraints aren't mandatory, but if installed they must fulfill the requirements laid in Regulation No. 17 concerning head restraints. However the definition of head restraint is unclear when it comes to what should be viewed as constituting a head restraint: for example, can any seatback extending beyond the 540 mm from reference point as given in item 5.9. be viewed as having integrated head restraint and thus being subject to testing accordingly, or should it be in the power of the manufacturer declare whether or not the seat in question has integrated head restraint?

QUESTIONS:

Do you agree our interpretation on this matter?

1. Please consider which of the following options you share:

		e17	
		Accepted	Rejected
A	Yes, if integrated, separate or detachable head restraints are installed in any category of vehicle, they must fulfil the requirements of Regulation No. 17 concerning head restraints	**X**	
B	Yes, any seatback extending beyond the definition given in item 5.9. should be viewed as a head restraint and should be tested accordingly	**X**	
C	No, only vehicles in which head restraints are mandatory should fulfil the requirements concerning head restraints		**X**
D	No, it is in the power of the seat manufacturer to determine whether or not the seatback constitutes an integrated head restraint		**X**

RESULT: The Netherlands: It should first be determined if the seatback is a head restraint. Then the headrest should fulfill the requirements. The area 540 to max height is considered to be the head restraint. Finland explains; the problem is point 5.9., 540 mm, how do we interpret this? The Netherlands: we support solution A. Solution B is a different approach. Not everything above 540 mm must be considered as a head restraint. There are certain criteria that we use: does it look like at head restraint? is it uncomfortable in a non-used position?, etc. The height is one of them. If it is below 700 it is clearly not a head restraint. Finland, France, Germany and Italy support solution A and B. The UK support solution C. There is discussion on different views. The UK and Finland suggest to consult Geneva on the subject. > No consensus is reached. Finland will bring the subject to the GRSP.

France	ECE R73.01 suppl. 1 – Parts I & III Vehicles with regard to their lateral protection devices / to the installation of LPD of an approved type	

Subject: LPD installation on central axle trailers, especially in case of a group of axles

References: ECE R73.01 suppl. 1

Part I : vehicles with regard to their lateral protection devices (LPDs)

12.4. The forward edge of LPD shall be constructed as follows:

12.4.1. Their position shall be:

12.4.1.1. On a vehicle of category N_2 or N_3: not more than 300 mm to the rear of the vertical plane perpendicular to the longitudinal plane of the vehicle and tangential to the outer surface of the tyre on the wheel immediately forward of the device;

12.4.1.2. On a drawbar trailer: not more than 500 mm to the rear of the plane defined in paragraph 12.4.1.1.;

12.4.1.3. On a semi-trailer: not more than 250 mm to the rear of the transverse median plane of the support legs, if support legs are fitted, but in any case the distance from the front edge to the transverse plane passing through the centre of the kingpin in its rearmost position may not exceed 2.7 m;

12.4.1.4. On a central axle trailer: in the area forward of the transverse plane passing through the centre of the front axle but not more than the front of the bodywork, if any, to ensure the normal manoeuvrability of the trailer.

(…)

12.5. The rearward edge of LPD shall not be more than 300 mm forward of the vertical plane perpendicular to the longitudinal plane of the vehicle and tangential to the outer surface of the tyre on the wheel immediately to the rear; a continuous vertical member is not required on the rear edge.

12.6. The requirements of paragraphs 12.4. and 12.5. are independent and cannot be combined. However, in the case of a vehicle having two steered axles an LPD shall not be required between those two axles if the longitudinal distance between their centre lines does not exceed 2 100 mm.

Part III : vehicles with regard to the installation of LPD of an approved type according to Part II of this Regulation.

15.2. The forward edge of LPD shall be constructed as follows:

15.2.1. Their position shall be:

15.2.1.1. On a vehicle of category N_2 or N_3 : not more than 300 mm to the rear of the vertical plane perpendicular to the longitudinal plane of the vehicle and tangential to the outer surface of the tyre on the wheel immediately forward of the device;

15.2.1.2. On a drawbar trailer: not more than 500 mm to the rear of the plane defined in paragraph 15.2.1.1.;

15.2.1.3. On a semi-trailer: not more than 250 mm to the rear of the transverse median plane of the support legs, if support legs are fitted, but in any case the distance from the front edge to the transverse plane passing through the centre of the kingpin in its rearmost position may not exceed 2.7 m.

- § 15.2.1.4. does not exist! -

15.3. The rearward edge of LPD shall not be more than 300 mm forward of the vertical plane perpendicular to the longitudinal plane of the vehicle and tangential to the outer surface of the tyre on the wheel immediately to the rear; a continuous vertical member is not required on the rear edge.

15.4 The requirements of paragraphs 15.2. and 15.3. are independent and cannot be combined. However, in the case of a vehicle having two steered axles an LPD shall not be required between those two axles if the longitudinal distance between their centre lines does not exceed 2 100 mm.

Issue

A lot of our central axle trailer manufacturers set up type-approved LPDs on their vehicles which leads them to apply Part III of ECE R73 to get their vehicle type-approval with regard to lateral protection.

But the omission of a § 15.2.1.4. setting requirements for central axle trailers in Part III raises the following questions.

Question 1

Does the omission of § 15.2.1.4. mean that central axle trailers are part of the “drawbar trailers” mentioned in § 15.2.1.2.?

Possible solution	Type-approval authority	E2
A	Yes, central axle trailers have drawbars, so they are included in “drawbar trailers” and must meet the requirements set out in § 15.2.1.2.	
B	No, there is an unfortunate omission but the provisions central axle trailers need to meet are the same as those set out in § 12.4.1.4.	X

The next 2 questions deal with the O4 central axle trailer enclosed in Appendix 1.

Question ~~1a~~ 2a

If answer A to question 1 has been chosen:

The space between the 2 wheels...

	Type-approval authority	E2
A1	… do not need LPD installation according to § 15.2.1.2. because the space behind the outer surface of the spray-suppression system immediately forward is smaller than 500 mm	
A2	… needs LPD installation according to § 15.3. because the space before the outer surface of the spray-suppression system immediately rearward is larger than 300 mm	
A3	… is not relevant here (solution 1B chosen)	X

Question ~~1b~~ 2b

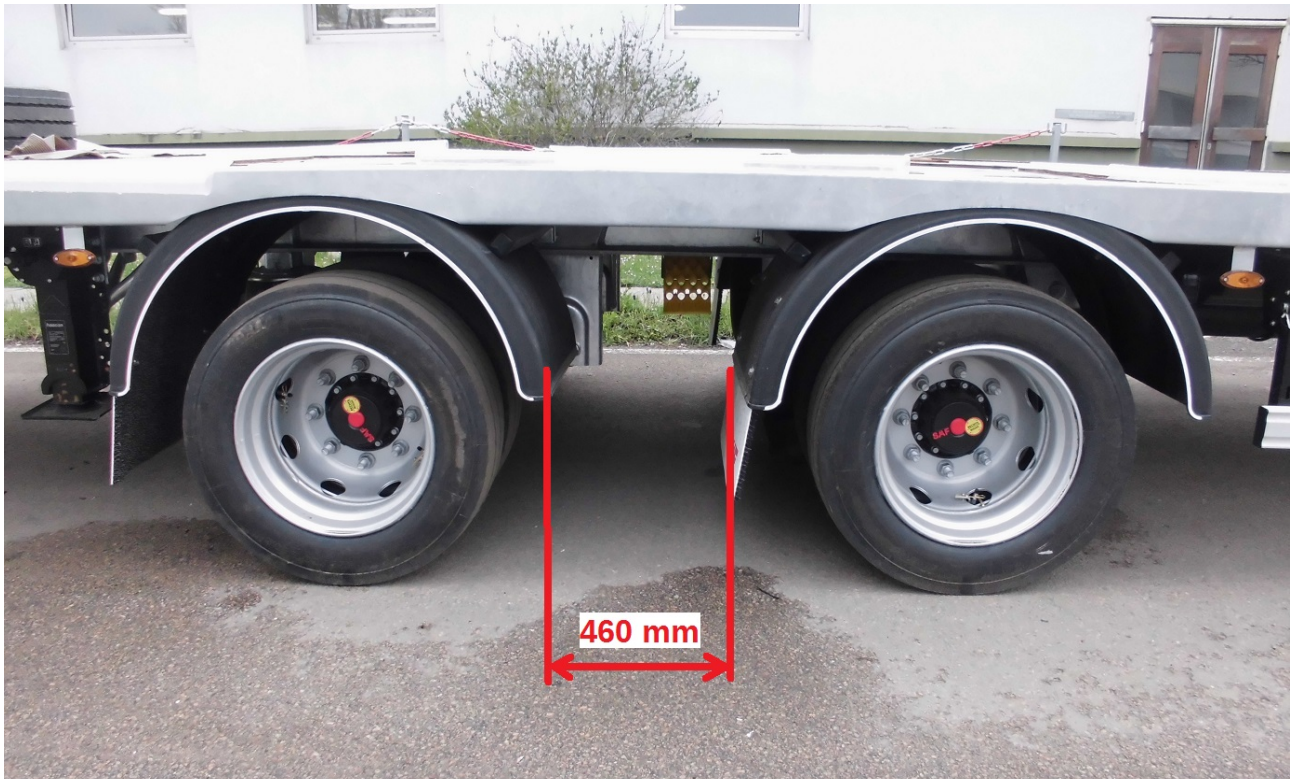
If answer B to question 1 has been chosen:

The space between the 2 wheels...

	Type-approval authority	E2
B1	… is not subject to LPD installation because § 12.4.1.4 only sets out requirements on the area of the trailer before the first axle	X
B2	… needs LPD installation according to § 15.3. (= § 12.5.) because the space before the outer surface of the spray-suppression system immediately rearward is larger than 300 mm and § 15.4. (= § 12.6.) provides that § 15.2. & 15.3. (= § 12.4. & 12.5.) need to be read independently and cannot be combined.	
B3	… is not relevant here (solution 1A chosen)	

RESULTS -1, -2a and 2b: (Correction: questions 1a and 1b should be 2a and 2b in the Agenda.) The Netherlands: We support solution 1.B. However, the question should be raised in the GRSG because of the way it is formulated at the moment. The requirements should be updated. Romania: we agree with solution 1.B but it actually should have protection. France supports solution 1.B. Germany is not in favour of solution 1.B but accepts it. They propose to discuss the subject in Geneva. For question 2a, France, Germany and the Netherlands support solution A.3 and for question 2b, France and the Netherlands support solution B.1, Germany is ot i o o option B.1. > There is no unified consensus on the subject. France will bring this item to the GRSG.

Appendix 1



Inter-axle = 1 600 mm – Tyres: 255/60 R 19,5

Remark: spray-suppression systems considered as components permanently fixed to the vehicle as allowed in § 15.9.

4.3

Germany: UN Regulation No. 51 – *"in normal use"*

27.11.2017

1. Reference:

UN Regulation No. 51

6.1.1. The vehicle, its engine and its noise reduction system shall be so designed, constructed and assembled as to enable the vehicle, **in normal use**, despite the vibration to which it may be subjected, to comply with the provisions of this Regulation.

Directive 70/157/ECC, Annex I & Annex II

5.1.1. The vehicle, its engine and exhaust and intake systems must be designed, constructed and mounted such that, **under normal conditions of use** and notwithstanding the vibrations to which they may be subject, the vehicle satisfies the requirements of this Directive.

Regulation (EU) No 540/2014, Article 5

1. Manufacturers shall ensure that vehicles, their engine and their silencing system are designed, constructed and assembled so as to enable such vehicles, when **in normal use**, to comply with this Regulation, despite the vibration to which such vehicles are inherently subjected.

UN Regulation No. 59

6.1.1. The replacement, exhaust system or components thereof must be designed, constructed and capable of being mounted so as to ensure that the vehicle complies with the provisions of this Regulation **under normal conditions of use**, notwithstanding any vibrations to which it may be subject.

2. Issue:

2.1. Some vehicle manufacturers equip several vehicle models with different operation modes for the user via switches (e.g. Eco, Performance …). The vehicles are only tested and fulfill the requirements in one mode, which may/shall be default on after ignition start.

2.2. The sound level of the stationary vehicle is measured in a different louder mode (e.g. Performance) than the sound level of the moving vehicle (e.g. Eco), because there are no limit values for the stationary vehicles and so the customer gets no problems during road side checks.

2.3. The vehicles are exorbitant louder, if the relevant type approval test criteria is not perfectly met (e.g. driving a bit slower, using cruise control …).

3. Interpretation (KBA)

3.1. The described issue in 2.1. is not in line with the demand that the vehicles shall fulfill the requirements/Regulation and limit values under normal conditions of use. Modes, which are used for circumvention of legislation and which are not tested, are not allowed. The worst case mode shall be tested and the vehicle has to fulfill the regulatory limit values (the same procedure applies for the exhaust emissions, a mode switch where the vehicle fulfils not the limit values during the cycle is also not allowed).

3.2. The vehicle shall be tested after a worst case consideration. For the stationary vehicle the loudest sound level shall be used as the worst case.

3.3. "Cycle beating" is not in line with the legislation.

Question:

1. Should all modes be categorized as normal conditions of use and no switch should be allowed which switching off type approved characteristics of a vehicle?
2. Should it be allowed to measure the sound level of the stationary vehicle and the moving vehicle as defined by the manufacturer?
3. Should cycle beating be accepted?

Possible solution

1.A	All modes shall be categorized as normal condition of use and shall fulfil the regulatory limits. The deactivation of type approved characteristics or functionalities are only allowed if it is explicit described in the legislation. (No special switch allowed)
1.B	Only one mode, as defined by the manufacturer, shall fulfil the requirements. To exceed the regulatory limits of the environmental legislation is accepted in other modes.
2.C	No, the sound level of the stationary and moving vehicle shall be tested under worst case conditions.
2.D	Yes, the manufacturer can decide in which mode the sound level of the stationary vehicle and the moving vehicle shall be tested.
3.E	Yes, cycle beating is in line with the legislation. It is accepted that the vehicles are exorbitant louder if the type approval relevant test criteria are not met perfectly.
3.F	No, the vehicle may be slightly louder, if the type approval relevant test criteria are not met and if there is a technical reason for the deviation. In general the vehicle may not be much louder than the limit values as defined in the legislation.

Type approving authority "e"	1

Selection of solution		accepted	refused
	1.A	X	
	1.B		X
	2.C	X	
	2.D		X
	3.E		X
	3.F	X	

RESULT -1 (1.A-1.B): Explanation by Germany: Most reactions we received were in line with our point of view. The Netherlands: with R51.03 we now have a different situation. The noise level can be outside the boundaries. There can be many different drive-modes which should all be tested. With hybrid vehicles, the state of the battery can make a lot of difference in the pass by noise. There also be a higher sound level at e.g. less than 100 % throttle which is not allowed. Germany: it is not allowed for manufacturers to have hidden modes (not described in the type-approval), all modes must be described. As KBA, we have a lot of problems with measuring the noise level. The vehicle should react during the test as it should on the road. We therefore take a more stringent approach. UK: the normal use is not very well defined, it should actually be defined in the type-approval. We want to explain that the vehicle in reality makes more noise than it is supposed to during the test. During the test, we measure the lowest level. The Netherlands: we have to follow the legislation of this present moment. Germany: the electronics generate new problems that did not exist in the past. After discussion, Germany and the Netherlands support solution 1.A and refuse 1.B.
> There is consensus on the solution 1.A. The discussion will be continued.
RESULT -2 (2.C-2.D): Germany and the Netherlands support solution 2.C and refuse 2.D.
> There is consensus on solution 2.C.
RESULT -3 (3.E-3.F): Germany and the Netherlands support solution 3.F where the Netherlands state that ASEP requirements apply. Germany and the Netherlands refuse 3.E.
> There is consensus on solution 3.F.

Germany: Information about German type-approval procedure under UN-Regulation No 51 or Regulation (EU) No 540/2014 for vehicles equipped with sound-actuators

KBA

15.05.2018

1. Reference:

- UN-Regulation No. 51, 03 series of amendments (R51.03)
- Regulation (EU) No 540/2014

2. Issue:

Vehicle manufacturers fit electronical controlled systems for modulation of the sound behavior of the vehicles, e.g. sound-generators, sound-actuators, consecutively named as additional system, to an increasing degree. It is the opinion of the KBA (Kraftfahrt-Bundesamt) that a type-approval according to the Regulations stated above for vehicle-types equipped with these additional systems may be granted to a whole vehicle manufacturer if the following requirements are fulfilled:

A) Documentation

In addition to the usual documentation for silencing systems the vehicle manufacturer shall send drawings and information about the identification of the additional systems (e.g. manufacturer of the system and part number) on the vehicle. Furthermore a description of the function, the working principles and the identification-number of the software of the electronic control module, used for type-approval tests of the additional system, shall be send. If a change of the software may have influence on the type-approved effectiveness of the additional system, the number of the changed software has to be announced to the type-approval authority by application of an extension to the type-approval. The software identification may be stated in the test-report or in the information document.

B) Sound of vehicles in motion and stationary sound

If an additional system can be switched off by the driver, comparative measurements with the system active and deactivated has to be performed. Sound limits have to be fulfilled in every mode. For systems without a switch, the manufacturer has to describe within his concept for preventing tampering and fault analysis, if and how the additional system will be deactivated and which effect will occur to the sound behavior of the vehicle.

If there are different driving modes (e.g. different gearshift modes of an automatic transmission or different modes for the accelerator pedal characteristic curve or other) which have an effect of the sound behavior of the additional system, tests have to be performed under “worst-case” conditions.

C) Additional Sound Emission Provisions (ASEP)

According to 6.2.3, last sentence, the sound emission of the vehicle under typical on-road-driving conditions shall not deviate from the test result (annex 3 and annex 7) in a significant manner.
In addition to the usual AESP-tests and manufacturers declaration, KBA demands a further manufacturers declaration that no extraordinary sound behavior of the additional system (e.g. jump to a physically unusual high sound emission) even at speeds outside the ASEP-boundaries (20 – 80 kph) is to expect.

D) Anti-tampering and fault

KBA demands a meaningful statement of the concept for prevention of tampering and fault-behavior of the additional system. The statement has to describe how tampering of the electronic control unit and the signal transmission by unauthorized users will be prevented. If a fault within the additional system occurs, it has to be monitored and the system has to switch off. The vehicle driver may be informed by an indicator light (e.g. MIL).

RESULT: Germany: manufacturers now use electronic sound-generators and sound-actuators on an increasing level in vehicles. This document is intended to explain how KBA approaches this subject. What are the issues? It is important to identify the software version that is installed on the vehicle. This is one part of the additional documentation. Another part is that we ask for a concept for anti-tampering. What happens if the system creates other sounds than for what it is approved? What happens outside the boundaries of the ASEP range? Maybe you can follow this information during type-approval and we are happy with any feedback you can provide on this subject. Italy: a quick response: We are against this approach. It seems to be more a political question. This approach is far beyond the legal boundaries. > There is some discussion on the subject but there are no generally supported viewpoints. The discussion will be continued.

4.5

Germany: UN-Regulation No. 48

15.05.2018

1. Reference:

UN Regulation No. 48

'Lamp' means a device designed to **illuminate the road or to emit a light signal to other road users**. Rear registration plate lamps and retro-reflectors are likewise to be regarded as lamps. For the purpose of this Regulation, light-emitting rear registration plates and the service-door-lighting system according to the provisions of Regulation No 107 on vehicles of categories M2 and M3 are not considered as lamps.

'Lighting mode' or 'mode' means a state of a front lighting function provided by the AFS, as specified by the manufacturer and intended for **adaptation to specific vehicle and ambient conditions**.

2. Issue:

2.1. Due to new technologies there are more possibilities in designing the lamps. There are different designs possible e.g. for the Direction-indicator lamp, Stop lamps, Front position lamps or AFS. Are there limitations in the design like the shape of a logo because of possible distraction of other road users?

2.2. The aim of a lamp is to illuminate the road or to emit a light signal to other road users. Is the function of a lamp limited to these functions or are additional functionalities possible in line with the legislation like providing further information to the driver. The way how to illuminate the road is maybe not clear and therefore irregular illumination of the road is possible in combination with the additional information to the driver. An AFS can have different mode to adapt the function of a front light system to specific vehicle and ambient conditions. These modes could include the information to the driver about the vehicle and ambient conditions (e.g. slippery road, critical distance to other vehicles, width of the vehicle …).
Due to different studies the additional information helps the driver and evaluated as positive. Negative effects like distraction of other road users could not be measured.

Question

1. Are there limitations in the design like the shape of a logo because of possible distraction of other road users?
2. It is possible to provide additional information to the driver by using an AFS?

Possible solution

1.A	The lamps have to fulfil are applicable requirements. The design of a lamp is not limited and therefore is a shape of logo in line with the legislation.
1.B	The signal of a lamp shall be clear and easy to understand. The design of a lamp shall not be used for e.g. advertising by illumining a logo. The aim of such advertising is to distract people and not to illuminate the road or to emit a clear and easy understandable light signal to other road users. Therefore a logo as a lamp is not in line with the legislation.
2.C	As long as the lamps fulfil the requirements, it is in line with the legislation to provide further information to the driver.
2.D	It is in line with the legislation to provide additional information to the driver, but the information shall be limited. The provided information has to be different to road signs, because the national authorities are responsible of such signs.
2.E	Additional information to the driver is not in line with the legislation.

Type approving authority "e"	1

Selection of solution		accepted	refused
	1.A		
	1.B		
	2.C		
	2.D		
	2.E		

RESULT -1 (1.A-1.B): Germany: the subject is being discussed in Geneva. Only what is allowed is specifically described. Now manufacturers ask for special designs of the lamps with e.g. the logo of the manufacturer. Sometimes this logo is very clear but sometimes it is not. Question: Is the logo a promotional or entertaining element of the vehicle or is it something else? What is allowed and what is not? Ireland, Italy and UK support solution 1.A (it is allowed). The Netherlands and Germany support solution 1.B (it is not allowed).
> No consensus is reached on the subject, the discussion will be continued.
RESULT -2 (2.C-2.E): Germany: it is now also possible to create projections on the road, like road signs or snow flakes, to give the driver more information. It is by our national German legislation not allowed to project something on the road, but is it allowed from the view-point of a type-approval? With new technology, many things are possible but it can become very confusing. France: For both questions we should wait for the conclusions of the GRE on this matter. Italy shares the opinion of France. UK: it is a key difference to provide information to the driver instead of illuminating the road, so therefore we accept these kind of projections. Ireland agrees: we believe that the additional information can be useful for the driver in difficult situations such as bad weather. We even propose to come up with new symbols like snow crystals that could be used. The Netherlands: we do not accept these projections because the lights should be symmetrical. Germany agrees: at the moment we do not grand approvals for these kind of projections on the road. We should wait until it becomes more clear what is acceptable and what is not. The UK and Ireland support solution 2.C (it is allowed). France, Germany, Italy, and the Netherlands support solution 2.E (it is not allowed). > There is no consensus on the subject, the discussion will be continued. It is advised to wait for feedback from GRE before granting approval.

4.6

Germany: Revision 3 of the 1958 Agreement – Granting of type approvals to earlier versions of UN Regulations

KBA

##.05.2018

1. Reference:

1958 Agreement - document E/ECE/TRANS/505/Rev.3
Section 4, article 12 allows Contracting Parties (CP) to issue type approvals to earlier versions of UN Regulations:

> " Contracting Parties may issue type approvals to earlier versions of UN Regulations, but they are not obliged to accept approvals issued to these earlier version."

Section 1, article 1 specifies:

> " However, Contracting Parties shall accept, as an alternative to the relevant part of their national/regional legislation, UN type approvals granted pursuant to the latest version of UN Regulations applied in their country/region."

Section 2, article 1 adds:

> **"** Notwithstanding other provisions of Article 1 and Article 12, a Contracting Party applying the UN Regulation on IWVTA shall only be obliged to accept those type approvals granted pursuant to the highest level of stringency of the latest version of the said UN Regulation."

General Guidelines for UN regulatory procedures and transitional provisions in UN Regulations document ECE/TRANS/WP.29/1044/Rev.2-advanced
Section 34. provides a definition for "Version" of a UN Regulation:

> " A "Version" of a UN Regulation is a legal status of that Regulation at a specific date and means the text [...] of the Regulation based on the original text of the Regulation or on a series of amendments including all subsequent Supplements and corrigenda to that series of amendments" that "are in force at that date."

Section 22. clarifies the function of new series of amendments and supplements:

> " [...] may result in new series of amendments in the case of a higher stringency of the requirements (e.g. more stringent limit values) or in Supplements in the case the level of stringency of the requirements is not changed or in the case of clarifications to the existing specifications aimed at avoiding misinterpretation."

2. Issue:

Conditions regarding firstly
granting of a type approval to a version of a Regulation and
secondly conditions regarding
granting of an extension to a type approval to a version of a Regulation.

Question:

1. Is it necessary to grant the approval according the original text of the Regulation or series of amendments including all supplements and corrigenda or is it possible to choose any text of the Regulation within a version of the Regulation?

2. Shall the extension be granted to the version of the Regulation or is it possible to choose any text of the Regulation within a version of the Regulation?

Possible solution

1.A	An approval shall be granted to a version of a Regulation including all subsequent Supplements and corrigenda.
1.B	An approval can be granted to any text of a Regulation within a version of a Regulation.
2.C	According the general guidelines (section 22, as quoted above) the level of stringency of the requirements shall not be changed by a supplement. Anyhow there are Regulations contradicting this general guideline as well as there are supplements entering into force with transitional provisions. For this reason extensions shall only be granted to the version of the Regulation including all subsequent Supplements and corrigenda at the time the extension is granted.
2.D	Following the general guidelines the level of stringency of the requirements shall not be changed by a supplement. For this reason extensions to an approval may be granted to any text of a Regulation within a version of a Regulation.

Type approving authority "e"	1

Selection of solution		accepted	refused
	1.A	x	
	1.B		x
	2.C	x	
	2.D		x

RESULT -1 (1.A-1.B): Explanation by Germany: The last supplement must be taken into account. What about the approvals that were issued before the 03 series of amendments? The Netherlands: if you need an extension of an older supplement version, it should fulfill the latest supplement requirements. The advice is to follow the last supplement, according to the 1958 agreement, also for extensions and revisions. Question: Did you already receive any applications from manufacturers for older versions? France: yes, we did. Spain: we already granted some approvals for brakes and installation of lights for older amendments. Luxembourg: we received some applications but we e not sure if they have already been granted. In September 2018. the GR's will follow-up on this issue.
Germany and the Netherlands accept solution 1.A and refuse 1.B.
> There is consensus on solution 1.A.
RESULT -2 (2.C-2.D): Question by the UK about 2.C: How do we exclude the intermediate supplements? Germany: We cannot exclude them. This is becoming a problem for the manufacturers. The GR's will follow-up on this issue. The Netherlands: it depends on the kind of changes in the supplement. Germany and the Netherlands support solution 2.C and refuse solution 2.D. > There is consensus on solution 2.C.

4.7

ITALY QUESTION N. 2

SUBJECT: UN Regulation No. 110 series 02 of amendments - CNG and LNG vehicles.

REFERENCE:

By comparison of three UN official language of points 18.5.2.1. and 18.5.6.2 of UN Regulation No. 110 series 02 seem to be different requirement.

- English

Paragraph 18.5.2.1., requires to be amended to read:
"18.5.2.1. The pressure relief device … of paragraph 18.5.5. below.
However, in case of vehicles of categories M and N where the container(s) is (are) **fitted outside the vehicle and on the roof or top of the bodywork of the vehicle**, the pressure relief device (temperature triggered) shall be fitted to the fuel container(s) in such a manner that it can discharge the CNG only in a vertical upward direction."
Paragraph 18.5.6.2., amend to read:
"18.5.6.2. The PRD (pressure triggered) shall … of paragraph 18.5.5. above.
However, in case of vehicles of category M and N where the container(s) is (are) **fitted outside the vehicle and on the roof or on the top of the bodywork of the vehicle**, the pressure relief device (pressure triggered) shall be fitted to the fuel container(s) in such a manner that it can discharge the CNG only in a vertical upward direction."

- French

Paragraphe 18.5.2.1., modifier comme suit :
« 18.5.2.1 Le dispositif de surpression … paragraphe 18.5.5 ci-dessous.
Toutefois, dans le cas des véhicules des catégories M et N dont le ou les réservoirs **sont montés à l'extérieur, sur le toit ou la partie supérieure de la carrosserie du véhicule**, le dispositif de surpression (à déclenchement thermique) doit être fixé sur le ou les réservoirs de carburant de manière telle que l'évacuation du GNC ne puisse se faire que verticalement vers le haut. ».
Paragraphe 18.5.6.2, modifier comme suit :
« 18.5.6.2 Le dispositif de surpression (à déclenchement manométrique) doit … paragraphe 18.5.5 ci-dessus.
Toutefois, dans le cas des véhicules des catégories M et N dont le ou les réservoirs **sont montés à l'extérieur, sur le toit ou la partie supérieure de la carrosserie du véhicule**, le dispositif de surpression (à déclenchement manométrique) doit être fixé sur le ou les réservoirs de carburant de manière telle que l'évacuation du GNC ne puisse se faire que verticalement vers le haut. »

- Russian

Пункт 18.5.2.1изменить следующим образом:
«18.5.2.1Предохранительное устройство сброса… пункта18.5.5 ниже.
Однако в случае транспортных средств категорий Ми N, если резерву-ар(ы) **установлен(ы) снаружи транспортного средства и (=and) на крыше либо в верхней части кузова транспортного средства, предохранительное устройство сброса давления** (срабатывающее при определенной тем-пературе) устанавливают натопливном(ых) резервуаре(ах) таким обра-зом, чтобы КПГ отводился только в направлении вертикально вверх».
Пункт 18.5.6.2изменить следующим образом:

«18.5.6.2ПОД (срабатывающий при определенном давлении) устанавливают… пункта18.5.5 выше. Однако в случае транспортных средств категорий Ми N, если резерву-ар(ы) **установлен(ы) снаружи транспортного средства и (=and) на крыше либо в верхней части кузова транспортного средства, предохранительное устройство сброса давления** (срабатывающий приопределенном давлении) устанавливают на топливном(ых) резервуаре(ах) таким образом, чтобы КПГ отводился только в направлении вертикально вверх».

QUESTION:

Using conjunction or comma may have different meaning in different language so some doubts arise whether or not all requirement to be fulfilled

E3

Possible solution		**accepted**	**refused**
Both requirement to be fulfilled: "fitted outside the vehicle **and** on the roof or fitted outside the vehicle **and** top of the bodywork of the vehicle .		X	
One requirement may be fulfilled instead of other: "fitted outside the vehicle **or** fitted on the roof the vehicle **or** fitted on top of the bodywork of the vehicle"			X

RESULT: Italy: we support solution B. France: the interpretation of Italy is correct we have checked it. France, Italy and the Netherlands support solution A. > After discussion, there is consensus on solution A, also because a recent proposal in GRSG points in this direction.

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-2018-01

v2.00 –March 2018

Directive or Regulation number:
ECE R116.00 (supplement 5)
Subject:
approval of gearshift control lock

Reference to Annex, etc in the Directive or Regulation:
paragraph 5.2.1., 5.2.4. and 5.3.3.

5.2.1.	The device to prevent unauthorized use shall be so designed that it is necessary to put it out of action in order to enable:
5.2.1.1.	the engine to be started by means of the normal control, and
5.2.1.2.	the vehicle to be steered, driven or moved forward under its own power
5.2.4.	The device to prevent unauthorized use referred to in paragraph 5.2.1. above, and the vehicle components on which it operates, shall be so designed that it cannot rapidly and without attracting attention be opened, rendered ineffective or destroyed by, for example, the use of low-cost, easily concealed tools, equipment or fabrications readily available to the public at large.
5.3.3.	Devices to prevent unauthorized use acting on the gearshift control
5.3.3.1.	A device to prevent unauthorized use acting on the gearshift control **shall be capable of preventing any change of gear.**
5.3.3.2.	In the case of manual gearboxes it must be possible to lock the gearshift lever in reverse only; in addition locking in neutral shall be permitted.
5.3.3.3.	**In the case of automatic gearboxes provided with a "parking" position it must be possible to lock the mechanism in the parking position only**; in addition locking in neutral and/or reverse shall be permitted.
5.3.3.4.	In the case of automatic gearboxes not provided with a "parking" position it must be possible to lock the mechanism in the following positions only: neutral and/or reverse.

Question:
A vehicle type with an automatic gearbox, uses the gearshift control as the device to prevent unauthorised use. It is provided with a parking position (P). Is it allowed for the gear shift lever to be circumvented by means of a screwdriver (or other tool falling under the description in section 5.2.4.) operating e.g. a release from underneath the vehicle or after taking an interior panel away in order to be able to move the lever from P => N (thus shifting to neutral) ?

Solutions:	
: A	yes, this is allowed
B	no, it must be possible to lock the mechanism in the parking position only and it may not be possible to override it by the use of simple tools

Possible decision:		
Solution	*Accepted*	*Refused*
A		X
B	X	

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

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-2018-01

v2.00 –March 2018

Remarks:
Manufacturers want to create this possibility to allow towing of a vehicle to the workshop after it ends up with e.g. a dead battery. They defend this solution by saying that it is also allowed to lock the vehicle in Neutral. Also, in case the vehicle has no P-position, it is allowed to lock in Neutral and/or Reverse. With a manual gearbox, it is always possible to tow, even when it is locked in Reverse, by applying the clutch. Also the general requirement under section 5.2.1.: *"or moved forward under its own power"* suggests that making it possible to tow the vehicle, does not cause any conflict. RDW has had the opinion so far, that although there is something to say for this, it does not meet the requirements in the legislation and therefore cannot be approved without changing the legislation. Besides, there are alternatives for making this change of gear to neutral possible, e.g. by using a locking mechanism operated by the vehicle's mechanical key. Recently we have been confronted with vehicle types approved under ECE R116, which have this possibility and therefore we look for consensus of what's allowed.

RESULT: The Netherlands: we have not yet approved these vehicles but there are vehicles on the market like these. We follow solution B. France and Italy agree and also support solution B. > There is consensus on solution B.

RDW

Division Vehicle Regulation & Admission

Netherlands 2

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-2018-02

v2.00 –March 2018

Directive or Regulation number:
ECE R13.11 (supplement 14)
Subject:
Determination if loadsensing function for brake force is mandatory

Reference to Annex, etc in the Directive or Regulation:
Annex 14

Text:
2.2. With trailers whose unladen mass is less than 75 per cent of their maximum mass, the braking force shall be automatically regulated as a function of the loading condition of the trailer.

Question:

In the case that the unladen mass is not less than 75 per cent of its maximum mass, automatic axle load sensing function for the brake force is not required. Beside this, according to the appendix to annex 14 footnote 1 the trailer has to be tested only in fully laden condition. For the testing of the brake performance with the maximum vehicle mass the loading of the axles should be proportional to the maximum permissible load (1.4.1.2.1. of annex 4)

In the case where there is a rather big margin between the sum of the technical maximum masses on each axle and total specified vehicle weight the approved axle load during the test could be far from the situation in normal use. (see explanation under remarks). In these loading conditions, due to the wheel locking, the demanded deceleration could possibly not be achieved and the vehicle could develop instable road behaviour during braking.

How should the load be distributed on the particular vehicle during brake tests to prove conformity with R13 requirements.

- Should the demand for an automatic regulation of the brake force based on the ratio of unladen and maximum mass, as stated in 2.2., be decided on the **individual axle weights** of the vehicle. The load distribution during the laden brake test, conform 1.4.1.2.1 of annex 4 (solution A)
- Should the demand for an automatic regulation of the brake force based on the ratio of unladen and maximum mass, as stated in 2.2., be decided on the **total weight** of the vehicle. The load distribution during the laden brake test, 1.4.1.2.1 of annex 4, in this particular vehicle setting be increased with extra distributions (see under remarks)(solution B)
- Should the demand for an automatic regulation of the brake force based on the ratio of unladen and maximum mass, as stated in 2.2., be decided on the **total weight** of the vehicle. The load distribution during the laden brake test, only conform 1.4.1.2.1 of annex 4 (solution C)

To explain the question with practical figures see information under ‘Remarks:’

Solutions:	
A	Ratio and demand for a load sensing function should be based on each individual axle
B	Ratio and demand for a load sensing function is determined on the total vehicle weight only. Extra tests in fully laden situation to prove that practical situations are covered are needed.
C	Ratio and demand for a load sensing function is determined on the total vehicle weight only. No extra tests than in fully laden situation conform 1.4.1.2.1 annex 4 are needed.

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-2018-02

v2.00 –March 2018

Possible decision:		
Solution	*Accepte*	*Refuse*
A		X
B	X	
C		X

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

Remarks:

Example vehicle specification:
Three axle full trailer.:
Technical maximum mass per axle: 1800kg
Maximum total vehicle weight: 3500 kg
Minimum unladen vehicle weight: 2625 kg
Load sensing device is not required

Solution A	axle 1 individual	axle 2 individual	axle 3 individual	total
test weight laden	1167	1167	1167	3500
test weight unladen	n.a.	n.a.	n.a.	n.a.
registration laden max.	1167	1167	1167	3500
registration unladen min.	875	875	875	2625

Solution B	axle 1 individual	axle 2 individual	axle 3 individual	total
test weight laden	1167	1167	1167	3500
test weight unladen	n.a.	n.a.	n.a.	n.a.
extra test laden	1800	1550	250*	3500
	250*	1800	1550	3500
	1550	250*	1800	3500
registration laden	1800	1800	1800	3500
registration unladen	250	250	250	2625

Solution C	axle 1 individual	axle 2 individual	axle 3 individual	total
test weight laden	1167	1167	1167	3500
test weight unladen	n.a.	n.a.	n.a.	n.a.
registration laden	1800	1800	1800	3500
registration unladen	--	--	--	2625

*for this question the individual minimum axle weight is suggested 250 kg. In practice this should be determined.

RESULT: The Netherlands: we have decided upon a practical way to test it and our current approach is solution B. We perform additional test to make sure. Question to the others: how do you approach this situation and how do you test it? France supports solution A. Romania is in favour of solution B. More information exchange and discussion on the subject will take place between the Netherlands and France. > No consensus is reached, the discussion will be continued.

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-2018-04

v2.00 –March 2018

Directive or Regulation number:
ECE R11.04 (supplement 1)
Subject:
requirements applicable to rear bumper latches in case of Wheelchair Accessible Vehicle or similar constructions

Reference to Annex, etc. in the Directive or Regulation:
ECE R11.04 paragraph 2.5

Text:
2.5 "Back door" is a door or door system on the back end of a motor vehicle through which passengers can gain ingress or egress (including ejection), or through which cargo can be loaded or unloaded

Question:

Do the additional latches being part of the bumper structure have to be seen as part of the back door locking device ?

Solutions:	
A	yes
B	no, if it can be shown that the back door will not release during the prescribed 30g tests even with the additional latches not in place

Possible decision:		
Solution	*Accepted*	*Refused*
A	X	
B	X	

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

RESULT: The Netherlands: we support both solutions A and B. UK explains that solution B is practiced by the VCA. Italy is in favour of solution A. France support solution B. > There is consensus on solution B.

Netherlands 5

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-2018-05

v2.00 –March 2018

Directive or Regulation number:
ECE 42.00 (supplement 1)
Subject:
sensors used for advanced driver assist systems under ECE R13-H and/or ECE R79

Reference to Annex, etc. in the Directive or Regulation:
ECE R42.00 paragraph 6.5.1.

Text:
6.1.5. The vehicle's propulsion, suspension (including tyres), **steering and braking systems** shall remain in adjustment and shall operate in a normal manner.

Question:
if sensors, camera's and/or radar devices etc. being part of driver assist systems get damaged, disoriented or broken due to an impact carried out according to Annex 3, do they fall under the provisions as described in section 6.1.5. ?

Solutions:	
A	yes
B	no, as long as the functionality of the mandatory basic systems being part of the braking requirements under ECE R13-H or ECE R13.11 and steering requirements under ECE R79.02 still comply with section 6.1.5.

Possible decision:		
Solution	*Accepted*	*Refused*
A		X
B	X	

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

Remarks:
ECE R42.00 is an old Regulation, originating long before advanced driver assist systems were introduced. Damage, disorientation and breakage of sensors being part of driver assist systems is covered under the requirements of Annex 8 to ECE R13-H, Annex 18 to ECE R13.11 and Annex 6 to ECE R79.02 which basically makes sure that any possible error in the system shall not lead to dangerous or unexpected behaviour of the vehicle. RDW has the opinion, that paragraph 6.1.5. is fulfilled as long as the required functionality of braking systems and steering systems, like ABS, ESP and e.g. the alignment of the wheels is still guaranteed. Failure of a sensor that would result in e.g. the assisted parking mode not functioning anymore, are excluded from the requirements under ECE R42 until further detailed requirements have been introduced in ECE R42.

RESULT: The Netherlands: we support solution B. It concerns an older regulation for which manufacturers still apply. If e.g. a sensor gets broken or disorientated, we still consider it to be acceptable for approval. Sensors and camera's did not exist at the time when this regulation was conceived. Italy, UK and France also support solution B. > There is consensus on solution B.

RDW

Division Vehicle Regulation & Admission

Netherlands 6

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-2018-06

v2.00 –March 2018

Directive or Regulation number:
ECE/TRANS/WP.29/2018/35 (proposal for ECE 79.03)
Subject:
maps used as input for possible activation of ACSF of category C

Reference to Annex, etc. in the Directive or Regulation:
ECE/TRANS/WP.29/2018/35 paragraph 5.6.4.2.3.

Text:
5.6.4.2.3. The system shall only be activated (standby mode) after a deliberate action by the driver. Activation by the driver shall only be possible on roads where pedestrians and cyclists are prohibited and which, by design, are equipped with a physical separation that divides the traffic moving in opposite directions and which have at least two lanes in the direction the vehicles are driving. These conditions shall be ensured by the use of at least two independent means. In the case of a transition from a road type with a classification permitting an ACSF of Category C, to a type of road where an ACSF of Category C is not permitted, the system shall be deactivated automatically

Question:
what can be regarded as a reasonable mandatory update frequency of maps used for geofencing ?

Solutions:	
A	realtime
B	at least once a month
C	not described; up to the Technical Service/Type Approval Authority

Possible decision:		
Solution	*Accepted*	*Refused*
A	X	
B	X	
C		X

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

Remarks:
RDW would like to get a common point of view/consensus as to what is reasonable as update frequency, in case maps are used as input for geofencing. Roads may change over time which may result in different use cases when ACSF of Category C may be activated. RDW believes a mandatory update frequency of once a month is reasonable.

RESULT: The Netherlands: geo-fencing is used nowadays. We propose to work according solution B with an update frequency of at least once a month. Italy also shares solution B. Real time would give the best results but this is not always possible. Belgium: imposing a certain update frequency will not guarantee that also the map itself is updated. We see no useful update frequency for the map itself, working along this approach is too much work, we support solution C. Germany: we also supports C because we also have some doubts. We believe it is up to the Technical Service. You cannot prevent that the map is outdated because it is not possible to check if the map is updated correctly. The Netherlands: We understand the motivations to support solution C and agree with it. > There is consensus on solution C.

RDW

Division Vehicle Regulation & Admission

Netherlands 7

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-2018-07

v2.00 –March 2018

Directive or Regulation number:
ECE R46.04 (supplement 4)
Subject:
Requirements for CMS for mandatory Fields of vision, and CMS and mirrors for surveillance purpose.

Reference to Annex, etc. in the Directive or Regulation:
paragraph 15.2.1.2. and 16.2.5.

Text:
15.2.1.2. The provisions of this Regulation do not apply to the surveillance mirrors defined in paragraph 2.1.1.3. Nevertheless, the exterior surveillance mirrors shall be mounted at least 2 m above the ground when the vehicle is under a load corresponding to its maximum technical permissible mass or shall be fully integrated in a housing including Class II or III mirror(s) which is (are) type approved to this Regulation. 16.2.5. The provisions of this Regulation do not apply to the surveillance camera-monitor-recording devices defined in paragraph 2.3. of this Regulation. Exterior surveillance cameras either shall be mounted at least 2 m above the ground when the vehicle is under a load corresponding to its maximum technical permissible mass, or, if their lower edge is less than 2 m from the ground, shall not project more than 50 mm beyond the overall width of the vehicle measured without this device and have a radii of curvature of not less than 2.5 mm.

Question:
Case 1: Vehicle manufacturer (N2 > 7.5 t and N3) has a CMS for the mandatory field of vision according to 15.2.4. Manufacturer wants to use a bracket for the monitor, which is possible to fold/turn away the monitor (with or without fixed steps) from his basic position. Basic position is the position where the monitor can fulfil the installation requirements. Background to make the bracket foldable/turnable is to use this space, for other purpose, in case of standing still on parking. **Question Case 1**: Is it allowed to have a foldable/turnable bracket for the monitor? Or should/may it be a fixed bracket, with a limited adjustment posibility, that in all possible positions, the installation requirements are guaranteed? **Case 2:** Vehicle manufacturer (N2 > 7.5 t and N3) has a CMS as a surveillance camera, in order to provide fields of vision other than those specified in paragraph 15.2.4. In case of a surveillance mirror or surveillance camera, the provisions of this Regulation do not apply (15.2.1.2., mirror and 16.2.5.,CMS). **Question Case 2:** 2.1 If vehicle manufacturer(N2 > 7.5 t and N3) has a surveillance mirror or CMS, should this be an approved component, according R46 to prevent mis-interpetations of what the driver see? 2.2 If it should an approved component, should there be a defined area of what is approved, and should also be included in the certificate and drivers manual? 2.3 Is the foldable/turnable bracket for the monitor as described in case 1, as a surveillance CMS acceptable? (In case it was not acceptable for the mandatory field of vision according to 15.2.4.)

Solutions: Case 1	
A	Fold-/turnable bracket for monitor is acceptable
B	Fold-/turnable bracket for monitor is **not** acceptable
C	Others…
Solutions: Case 2	
A	CMS and mirror should be of an R46 approved type.
B	CMS and mirror do **not** have to be, but may be of an R46 approved type.
C	The intended area of field of vision, should be included in certificate and owner's manual.
D	The intended area of field of vision, should **not** be included in certificate and owner's manual.
E	Fold-/turnable bracket for monitor is acceptable
F	Fold-/turnable bracket for monitor is **not** acceptable

Possible decision: Case 1		
Solution	*Accepted*	*Refused*
A		X
B	X	
C		X
Possible decision: Case 2		
Solution	*Accepted*	*Refused*
A	X	
B		X
C	X	
D		X
E		X
F	X	

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

Remarks:

RESULT -Case 1 (A-C): Question by France for the Netherlands: why do you choose for solution B? The Netherlands: With a monitor in comparison with a traditional mirror, it is possible to interpret the image wrong. Germany and France also agree with solution B.
> There is consensus on solution 1.B.
RESULT -Case 2 (A-F): The following choices are made:
A: The Netherlands accept, France and the UK refuse.
B: The Netherlands, France and the UK Refuse.
C: The Netherlands, and France accept. France: this should be included in the owner's manual.
D: France and the UK accept, the Netherlands refuse.
E: France and the UK accept, the Netherlands refuse.
F: The Netherlands, France and the UK accept.
> No consensus is reached on the matter. The Netherlands will go back to the truck manufacturer to discuss the subject.

Netherlands 8

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-2018-08

v2.00 –March 2018

Directive or Regulation number:
ECE R78.04
Subject:
ABS-off in case only one wheel is affected

Reference to Annex, etc. in the Directive or Regulation:
paragraph 5.1.16

Text:	
5.1.16.	**A means to deactivate the antilock brake system is not permitted**. By derogation, vehicles which are suitable for off road driving and fitted with a riding mode selector allowing an "off-road" or "all terrain" mode may be fitted with a single means (e.g. switch, lever, button, menu option) to disable the antilock brake system function, which is only permitted under the following conditions: (a) through (f)
(g)	Instantaneous re-enablement of a functional stage which complies with anti-lock brake system approval requirements of the antilock brake system under all operation modes shall be warranted and shall be demonstrated to the satisfaction of the certification authority (e.g. simple press of a button)

Question:
When ABS can be switched off on one wheel only, is this considered ABS-off for the purpose of paragraph 5.1.16. or can it be considered to be just a different ABS mode.

Solutions:	
A	since it changes the functionality of the ABS system, it must be considered as ABS-off
B	since a vehicle type with ABS on one wheel only can be approved under ECE R78.04, it can be considered a different ABS mode still fulfilling the anti-lock brake system approval requirements. Therefore the provisions under section 5.1.16 do not apply (i.e. this mode is allowed on all kinds of motorcycles with no special limitations

Possible decision:		
Solution	*Accepted*	*Refused*
A	X	
B		X

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

Remarks:
RDW has the opinion that if the functionality of the ABS system is affected, it is only allowed under the provisions of paragraph 5.1.16. You could interpret it such though that ABS on one wheel only is still meeting the ABS requirements (by lack of specific requirements or even the need to have ABS under ECE R78.04). Therefore we are looking for consensus and interested in hearing other TAA's points of view.

RESULT: The Netherlands: it is our opinion that if the function of ABS can be switched Off on one wheel only, this should be considered as 'ABS Off' (Solution A). The UK: we had the same question by a manufacturer and came to the same conclusion: we support solution A. Belgium also supports Solution A. Italy supports solution B. Germany: we are open for opinions but we also support solution B. The Netherlands: ABS on both wheels cannot be required because it is not very well defined. If that were the case, would it change the opinion of Germany? Germany: yes it would. As long as 168/2013 still does not require ABS to be equipped on both wheels, Italy and Germany support solution B. UK: we would advice a manufacturer that solution A is our opinion. > No consensus is reached on the subject, the Netherlands will prepare a question for the next TAAEG.

RDW Division Vehicle Regulation & Admission

Netherlands 10

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-2018-10

v1.00 –March 2018

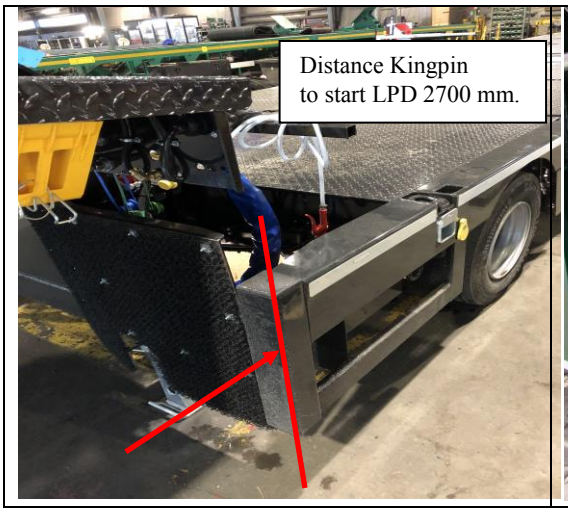
Directive or Regulation number:
ECE R73.01 Supplement 1
Subject:
Lateral protection device (LPD) inboard position from the outermost plane

Reference to Annex, etc in the Directive or Regulation:
Part I, 12 Requirements & Part III, 15 Requirements

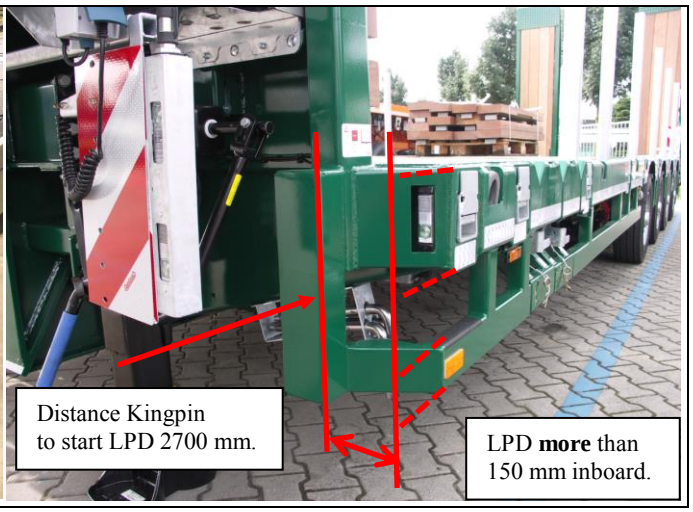
Text:
12.1 / 15.1: LPD shall not increase the overall width of the vehicle and the **main part** of their outer surface shall not be more than 150 mm inboard from the outermost plane (maximum width) of the vehicle. Their forward end may be turned inwards on some vehicles in accordance with paragraphs 12.4.3. and 12.4.4. Their rearward end shall not be more than 30 mm inboard from the outermost edge of the rear tyres (excluding any bulging of the tyres close to the ground) over at least the rearmost 250 mm.

Question:
Is it allowed to have the LPD more than 150 mm inboard from the outermost plane?

Solutions:	
A	No, the LPD shall not be more than 150 mm. inboard from the outermost plane. (see picture 1)
B	Yes, LPD may be more than 150 mm inboard from the outermost plane as long the **main part** (more than 50%) of LPD in within 150 mm. inboard from the outermost plane.
C	Yes, LPD may be more than 150 mm inboard from the outermost plane but only if the LPD is following the contour of the vehicle. (see picture 2)



Picture 1



Picture 2

Possible decision Q1:		
Solution	*Accepted*	*Refused*
A	x	
B		x
C	x	

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

Remarks:
- Also for an RUP, this is common

RESULT: The Netherlands: we consider solutions A and C acceptable. France: supports solution A. There is no exception for body shapes. Finland also supports solution A.
> There is consensus on solution A. The Netherlands: we will discuss the outcome with our Heavy vehicle department.

RDW

Division Vehicle Regulation & Admission

Netherlands 11

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-2018-11

v2.00 –March 2018

Directive or Regulation number:
ECE R79.02
Subject:
Steering Equipment

Reference to Annex, etc in the Directive or Regulation:
Annex 4. § 2.3. Warning signals in case of failure

Text:
2.3. Warning signals in case of failure. 2.3.1. Except for parts of ASE not considered susceptible to breakdown as specified in paragraph 5.3.1.1. of this Regulation, the following failure of ASE shall be clearly brought to the attention of the driver. 2.3.1.1. A general cut-off of the ASE electrical or hydraulic control. 2.3.1.2. Failure of the ASE energy supply. 2.3.1.3. A break in the external wiring of the electrical control if fitted.

Question:
In the TAAM of Prague, November 2014, it is decided that a single external (ground) wire break of an ECU must be detected. Some manufacturers cannot agree with this decision. Their argument is, that the design with more than 1 single external ground gives a higher robustness of the system, and the functionality of the system is still guaranteed if there are 1 or more ground wires not connected or damaged. Is the following approach acceptable of point 2.3.1.3. "A break in the external wiring of the electrical control if fitted": 1) a single external wire break of the ECU must be detected, or; 2) In case of a system with more than 1 single ground wire, wire break must at least be detected, if the functionality of the system is no longer guaranteed. In case 2: During tests of ASE annex 4, and in addition to the requirements given in the body of this Regulation, that 100% functionality of the system is still guaranteed, with the minimum number of wires, If in the condition as described above, 1 more ground wire will fail / be disconnected, the failure should be clearly brought to the attention of the driver. (manufacturer shall provide evidence to the technical service if necessary of worst-case combination(s) for testing)

Solutions:	
A	This solution is acceptable
B	This solution is not acceptable

Possible decision:		
Solution	*Accepted*	*Refused*
A	X	
B		

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

Remarks:
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RESULT: The Netherlands; this is a topic from some years ago. RDW sees it as an additional ground wire. We support solution A. Germany: we would like to see the regulation to be updated but solution A is not a problem for us. Belgium, Bulgaria, the Netherlands, the UK and Germany are in favour of solution A. > There is consensus on solution A. However, the regulation should be clarified and therefore RDW will prepare an informal document for the GRRF.

Netherlands 12

Questions by the TAAM delegation of the Netherlands
RDW-TAAM-2018-12

v2.00 –March 2018

Directive or Regulation number:
ECE R13.11 (supplement 14)
Subject:
Capacity of energy storage devices

Reference to Annex, etc in the Directive or Regulation:
Annex 7

Text:
1.2.1. The energy storage devices (energy reservoirs) of power-driven vehicles shall be such that after eight full-stroke actuations of the service braking system control the pressure remaining in the energy storage device(s) shall be not less than the pressure required to obtain the specified secondary braking performance. 1.2.2.3. In the case of power-driven vehicle to which the coupling of a trailer is authorized and with a pneumatic control line, the supply line shall be stopped and a compressed-air reservoir of 0.5 litre capacity shall be connected directly to the coupling head of the pneumatic control line. Before each braking operation, the pressure in this compressed-air reservoir shall be completely eliminated. After the test referred to in paragraph 1.2.1. above, the energy level supplied to the pneumatic control line shall not fall below a level equivalent to one-half the figure obtained at the first brake application.

Question:
Background: In 1.2.2.3. there is referred to test procedure of 1.2.1. The requirement in 1.2.2.3. is based on the energy level **supplied to** the pneumatic control line. At the moment the foot brake pedal is fully applied the pressure measured at the control line is equal with the supply pressure to the control line. Question: To measure the actual energy level that is supplied to the pneumatic control line for the trailer the brake pedal must be applied. The question is what application, the 8th or a 9th, should be used to decide if the requirement 1.2.2.3. is fulfilled

Solutions:	
A	Energy level measured at pneumatic control line at the **eighth** application is decisive
B	Energy level measured at pneumatic control line at the **ninth** application is decisive

Possible decision:		
Solution	*Accepted*	*Refused*
A	X	
B		X

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

Remarks:
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RESULT: Explanation by the Netherlands: RDW supports solution A (the eighth application is decisive). France and Germany support solution B (the ninth application is decisive). France: the measurement should be taken not at, but after the eighth (i.e. the ninth) application. France: there should be a clear description in section 5.2.1.13.1. Switzerland will consult their experts. > There is consensus on solution B (the ninth application).

REGISTRUL AUTO ROMÂN ROMANIA 1

Directive or Regulation number
UN ECE 13 Braking

Subject
M_2, M_3, anti-lock systems of category 1

Reference to Annex, etc in the Directive or Regulation
Annex 13

Text
Item 3.1.1. Category 1 anti-lock system A vehicle equipped with a category 1 anti-lock system shall meet all the relevant requirements of this annex.

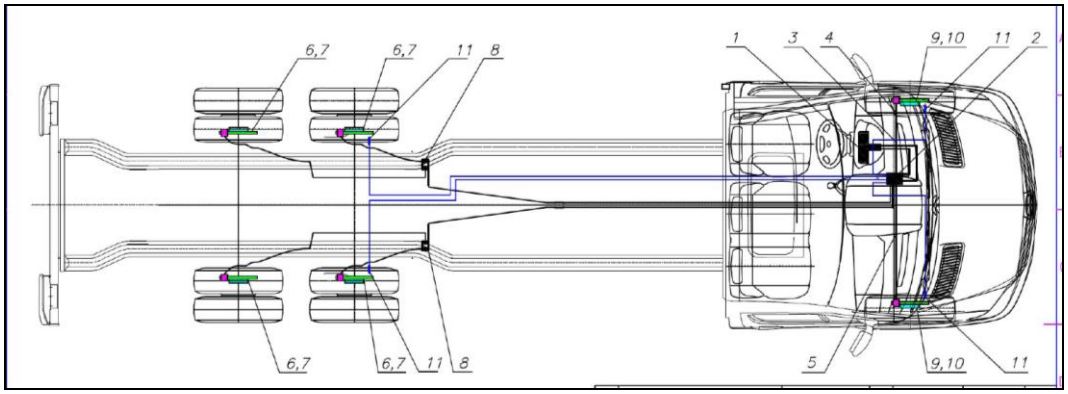
Question
The system, described in the attached drawing, may be considered as an anti-lock system of category 1 in the case of a completed vehicle which is equipped by the manufacturer of the second stage with a third axle, with indirectly controlled wheels for this axle and all the requirements of annex 13 are met?

Possible decision

Solution	Accepted	Refused
A	X	
B		X

Authority
Type Approval Authority e/E: 19

Remarks
OEM third axle installed in the second stage is the same type as first stage one.



1	Hydraulic pump	7	Brake caliper rear axle
2	ABS modulator	8	Hydraulic supply distributor
3	Hydraulic supply rigid line left front wheel	9	Brake disc front axle
4	Hydraulic supply flexible line front wheel	10	Brake caliper front axle
5	Hydraulic supply rigid line right front wheel	11	ABS senor
6	Brake disc rear axle		

RESULT: Romania: this is an important subject for buses in Romania. We prefer solution B but solution A is also possible in case all the applicable tests required by R13 are done (especially those in Annex 13). Italy: in the 2nd stage, we have to check the base vehicle, the right answer should be solution B. The Netherlands also support solution B. > There is consensus on solution B.

TAAM, Utrecht, Netherland (June 28 and 29, 2018) **Switzerland 1**

SUBJECT: semi-trailers equipped with landing gear

DIRECTIVE: UN-regulation no. 55, annex 7, paragraph 1.5.2
UN-regulation no. 13, annex 4, Paragraph 3.2.1

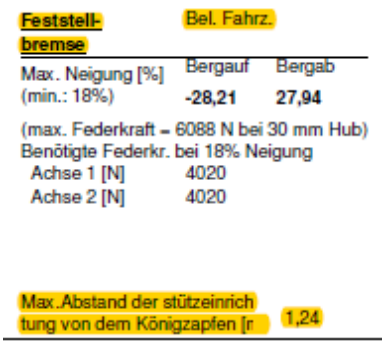
Background

According to paragraph 1.5.2, annex 7 of UN-regulation no. 55 semi-trailers shall be equipped with landing gear or any other equipment which allows uncoupling and parking the semi-trailer. These requirement shall not apply in the case of semi-trailers designed for special operations where they are normally only separated in a workshop or when loading and unloading in specifically designed operating areas.

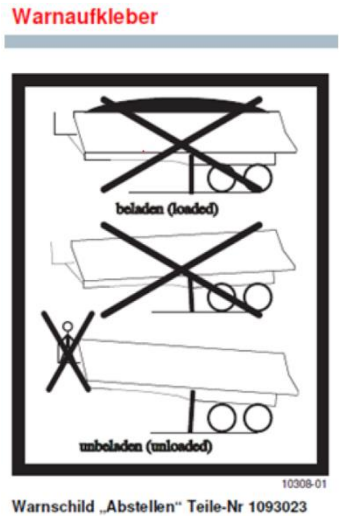
Paragraph 3.2.1 annex 4 of UN-regulation no. 13 stipulates: The parking braking system with which the trailer is equipped shall be capable of holding the laden trailer stationary, when separated from the towing vehicle, on an 18 per cent up or down-gradient.

Major Concern

For demonstration of the parking brake performance the distance between landing gear (landing legs) and the center of the axles (E_L) is taken into account (paragraph 4.2.2.3. annex 20 of UN-regulation no. 13). In consequence the distance between landing gear and center of the axles has a limit. In the example of a semi-trailer (picture «Feststellbremse») the limit is expressed as the distance between kingpin and landing gear (see picture on page 2; max. 1240 mm). But in fact, this distance is 2450 mm. Due to the fact the landing gear is installed near to the centre of gravity parking the trailer may be dangerous! Therefore, the manufacturer has affixed a warning sticker on the chassis (see picture «Warnaufkleber»).

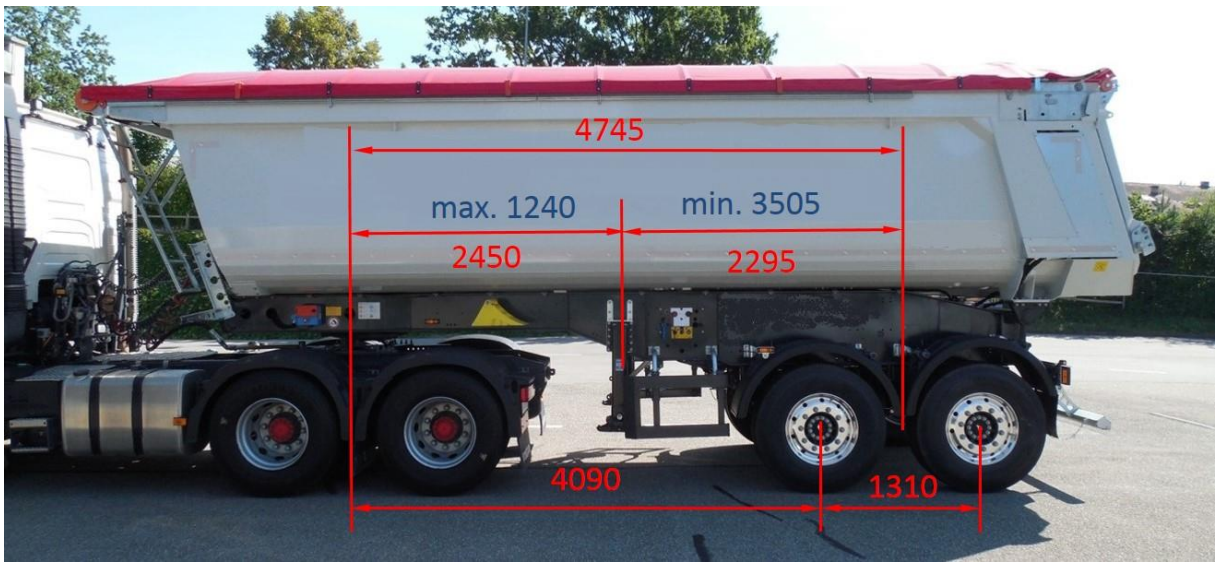


Feststell-bremse	Bel. Fahrz.	
Max. Neigung [%] (min.: 18%)	Bergauf	Bergab
	-28,21	27,94
(max. Federkraft = 6088 N bei 30 mm Hub)		
Benötigte Federkr. bei 18% Neigung		
Achse 1 [N]	4020	
Achse 2 [N]	4020	
Max.Abstand der stützeinrichtung von dem Königzapfen [r	1,24	



Warnschild „Abstellen" Teile-Nr 1093023

In our opinion this configuration is not in line with the requirements of the paragraphs mentioned above. In addition, this kind of semi-trailer is not designed for special operations. The trailer manufacturer is arguing, that this configuration of the landing gear is accepted by the authorities of EU-member-states. In fact, there are some type approvals where such configurations seemed to be accepted (see picture on the right presenting a semi-trailer parked with an additional red colored support).



The blue letters are indicating the maximum (max.) resp. minimum (min.) dimensions (mm) specified in relation to the brake calculation. The red letters are marking the actual dimensions (mm) of the semi-trailer.

Questions

	Possible solution	accepted	not accepted
A	Do you agree that the semi-trailer, as presented, does not respect the requirements of UN Regulation No. 55 and UN Regulation No. 13? There is no regulation allowing a warning sticker on the chassis (picture «Warnaufkleber») indicating not to park the laden trailer if these requirements are not respected.	CH	
B	Is this kind of semi-trailer designed for special operations and normally only separated in a workshop or when loading and unloading in specifically designed operating areas?		CH
C	Exists other specifications or other solutions?		

RESULT: Switzerland: we support solution A because we believe that this trailer does not comply with the regulation, it is also a safety issue. A warning sticker is not allowed. The Netherlands fully support solution A. > There is consensus on solution A.

4.20

Vehicle Certification Agency

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THE UNITED KINGDOM VEHICLE APPROVAL AUTHORITY

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TAAM Netherlands 2018 - United Kingdom

Regulation or Directive Number: UNECE Regulation 48.06

Subject: Lighting Installation

Legislation

5.21. The apparent surface in the direction of the reference axis of front and rear position lamps, front and rear direction-indicator lamps and retro-reflectors shall not be hidden more than 50 per cent by any movable component, with or without a light-signalling device installed on it, in any fixed position different from the "normal position of use".

Fixed position of a movable component means the stable or natural rest position(s) of the movable component specified by the vehicle manufacturer, whether locked or not. If the above requirement is not practicable:

5.21.1. Additional lamps satisfying all the position, geometric visibility, colorimetric and photometric requirements for the above indicated lamps shall be activated when the apparent surface in the direction of the reference axis of these lamps is more than 50 per cent hidden by the movable component; or

5.21.2. A remark in the communication form (item 10.1. of Annex 1) shall inform other Administrations that more than 50 per cent of the apparent surface in the direction of the reference axis can be hidden by the movable components; and A notice in the vehicle shall inform the user that in certain position(s) of the movable components other road users shall be warned of the presence of the vehicle on the road; for example by means of a warning triangle or other devices according to national requirements for use on the road.

5.21.3. Paragraph 5.21.2. does not apply to retro-reflectors.

6.5 Direction Indicator Lamp

6.5.4. Position

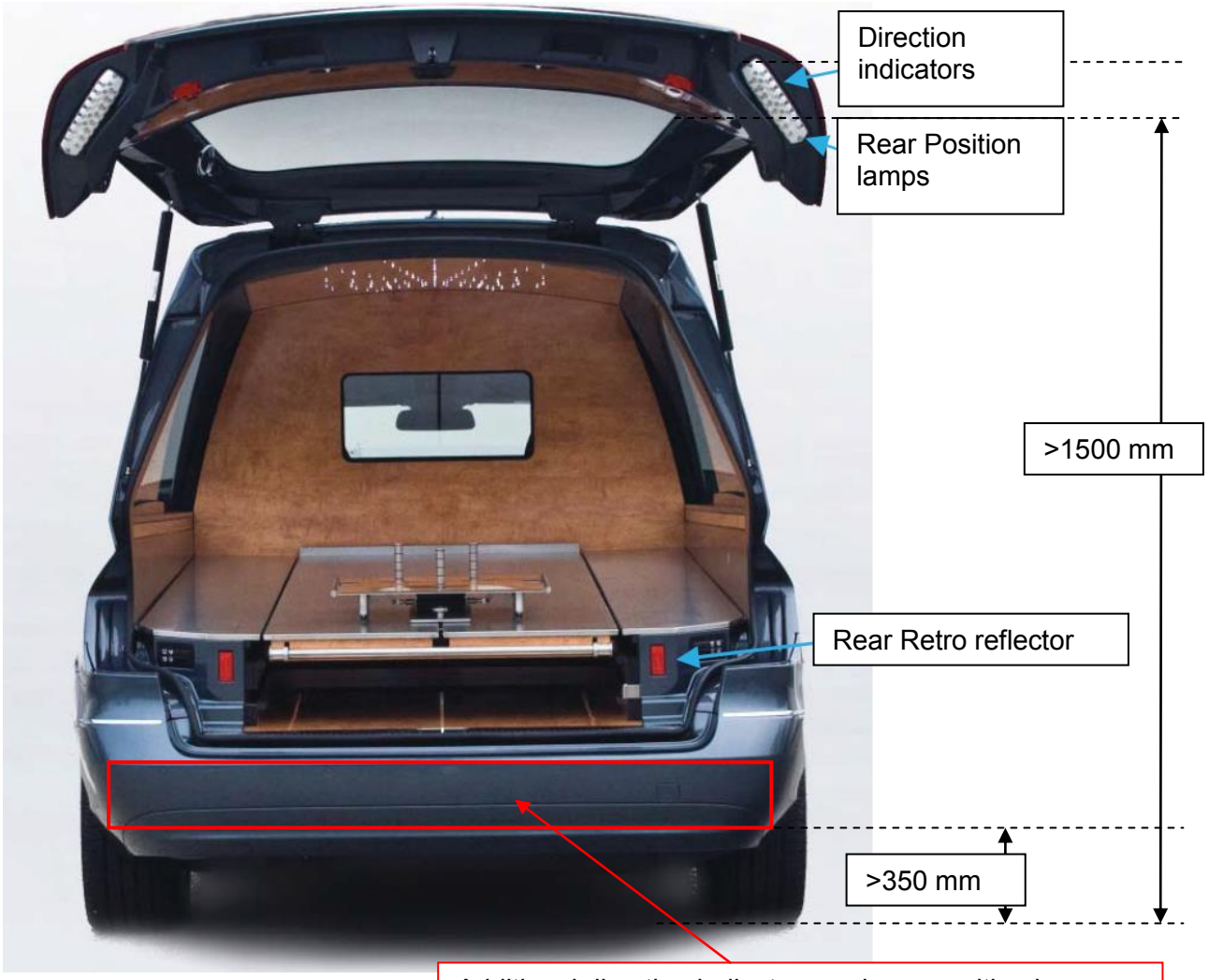
6.5.4.2.2. The height of the direction-indicator lamps of categories 1, 1a, 1b, 2a and 2b, measured in accordance with paragraph 5.8., shall not be less than 350 mm and not more than 1,500 mm.

6.5.4.2.3. If the structure of the vehicle does not permit these upper limits, measured as specified above, to be respected, and if the optional rear lamps are not installed, they may be increased to 2,300mm for side direction-indicator lamps of categories 5 and 6, and to 2,100 mm for the direction-indicator lamps of categories 1, 1a, 1b, 2a and 2b.

Discussion

The rear lamp arrangement on a hearse is shown below:

When the boot is lifted the complete rear lamp arrangement is taken away to allow for a wide loading bay.



Questions

If it is possible to install the additional rear direction indicators, rear position lamps and rear reflex reflectors in the bumper at a height of > 350 mm and ≤ 1500 mm is it acceptable to use the derogation in 6.5.4.2.3.?
The rationale being that for this specific vehicle when the tailgate is open funeral directors will be in front of the loading area and potentially obscuring any lights installed in the bumper. Therefore using the principle of proportionality it is safer to have lamps installed at the derogated position.

Suggested Answers

A. Yes
B. No

Type approving authority "e"	11
Question	1
A	
B	

RESULT: The UK: as long as additional lamps comply with the requirements, their use is acceptable according the regulation. However, Is it acceptable to use them in this specific position? The UK supports solution B; it is not acceptable. The Netherlands also support solution B because RDW believes that the vehicle can still comply regardless its special purpose. > There is consensus on solution B.

4.21

Vehicle Certification Agency

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THE UNITED KINGDOM VEHICLE APPROVAL AUTHORITY

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TAAM Netherlands 2018 - United Kingdom

Regulation or Directive Number: UNECE Regulation 48.06

Subject: Lighting Installation

Legislation

6.2.7.6.1. The dipped-beam headlamps shall be switched ON and OFF automatically relative to the ambient light conditions (e.g. switch ON during night time driving conditions, tunnels, etc.) according to the requirements of Annex 13;

6.2.7.7. Without prejudice to paragraph 6.2.7.6.1., the dipped-beam headlamps may switch ON and OFF automatically relative to other factors such as time or ambient conditions (e.g. time of the day, vehicle location, rain, fog, etc.)

Annex 13 - AUTOMATIC SWITCHING CONDITIONS DIPPED-BEAM HEADLAMPS

Automatic Switching Conditions Dipped-Beam headlamps[1]		
Ambient light outside the vehicle[2]	Dipped-beam headlamps	Response time
less than 1,000 lux	ON	no more than 2 seconds
between 1,000 lux and 7,000 lux	at manufacturer's discretion	at manufacturer's discretion
more than 7,000 lux	OFF	more than 5 seconds, but no more than 300 seconds

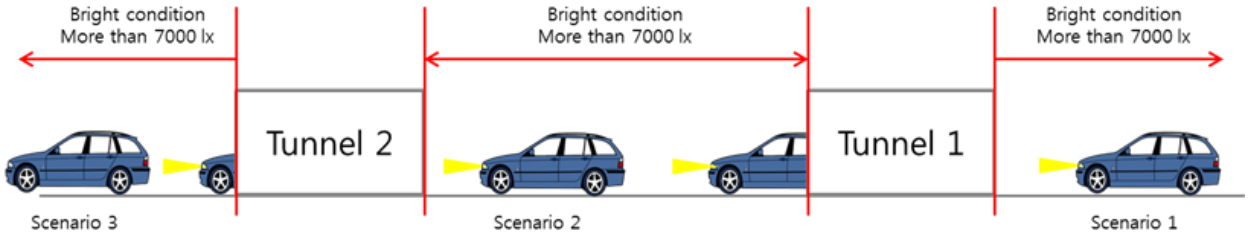
As background information there are two proposals to amend paragraph 6.2.7.7 of the legislation but it has not yet been approved through GRE.

ECE/TRANS/WP.29/GRE/2018/20,
ECE/TRANS/WP.29/GRE/2018/22

Discussion

Background information regarding how the system works

Scenario 1: When the vehicle is approaching the tunnel, ambient >7000 lux, the headlamp is switched ON automatically around 5 seconds in front of the tunnel by GPS sensing.



Scenario 1 : When GPS detects the tunnel is coming in 5 seconds, Headlamp is switched ON automatically in bright condition.

Scenario 2 : Between tunnel 1 and 2 head lamp remains on because GPS detects next tunnel is close
(There are maximum 250m left to the next tunnel after 5 seconds from tunnel 1 exit)
※ If there are more than 250 m left, head lamp is switched OFF automatically by ambient condition

Scenario 3 : After the vehicle pass through the tunnel, there is no next tunnel closely, head lamp is switched off automatically by ambient condition

Questions

1. **Is this acceptable to automatically operate the headlamps outside of the requirements of Annex 13, as described in Scenario 1 as an example, due to external factors?**

Type approving authority "e"	11
Question	
A. Yes	
B. No	

RESULT: The UK: it concerns the automatic on-off switching of dipped-beam headlamps under atmospheric conditions such as driving through tunnels, etc. The UK believes this is acceptable. France: It might be better to wait for the Task Force of GRE before deciding. The UK: we are following this group for other issues as well, we wait for the outcome but are seeking clarification in advance. Belgium, Germany, the Netherlands and the UK support solution A. > There is consensus on solution A, but the Task Force of GRE should give clarification.

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TAAM Netherlands - United Kingdom

Regulation or Directive Number: UNECE Regulation 83 and 101

Subject: Selection of Hybrid Modes

Legislation

3.2.1.3 The operating mode shall be positioned according the table below:

Hybrid-modes / Battery state of charge	— Pure electric — Hybrid Switch in position	— Pure fuel consuming — Hybrid Switch in position	— Pure electric — Pure fuel consuming — Hybrid Switch in position	— Hybrid mode n (1) … — Hybrid mode m (1) Switch in position
Condition A Fully charged	Hybrid	Hybrid	Hybrid	Most electric hybrid mode (2)
Condition B Min. state of charge	Hybrid	Fuel consuming	Fuel consuming	Most fuel consuming mode (3)

(1) For instance: sport, economic, urban, extra-urban position, etc.
(2) Most electric hybrid mode:
The hybrid mode which can be proven to have the highest electricity consumption of all selectable hybrid modes when tested in accordance with condition A of paragraph 4 of Annex 10 to Regulation No 101, to be established based on information provided by the manufacturer and in agreement with the technical service.
(3) Most fuel consuming mode:
The hybrid mode which can be proven to have the highest fuel consumption of all selectable hybrid modes when tested in accordance with condition B of paragraph 4 of Annex 10 to Regulation No 101, to be established based on information provided by the manufacturer and in agreement with the technical service.

Questions

1. Does the hybrid mode selection have to be through a single switch/control?

Suggested Answers

Type approving authority "e"	11
Question	**1**
A. Yes	
B. No	

2. If there are modes (Hybrid, Pure EV or Pure Fuel Consuming) selectable separately to the main hybrid mode selection switch/control should these be considered when selecting the test mode?

Type approving authority "e"	11
Question	**2**
A. Yes	
B. No	

RESULTS -1 and -2: The UK: within the discussion there is consensus that it does not matter how a hybrid mode can be selected, i.e. every possible mode has to be taken into account. Germany, the Netherlands and the UK support solution 1.B and 2.A.
> There is consensus on solution 1.B. and 2.A.

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Regulation or Directive Number: UNECE Regulation 118.01 & 02

Subject: Adhesives

Legislation:

5.2.4. Any adhesive agent used to affix the interior material to its supporting structure shall not, as far as possible, exacerbate the burning behaviour of the material.

Discussion:

There is a lack of clarity within the regulation on how to test and document requirement 5.2.4. at a vehicle installation level. Manufacturers would like to know if the options detailed within this document are accepted by type approval authorities to demonstrate that adhesive agents used within the vehicle do not exacerbate the burning behaviour of the material as required by point 5.2.4.

Question 1

1) What level of documentation is acceptable to confirm compliance of an adhesive agent with paragraph 5.2.4?

Suggested Answers

Type approving authority "e"	11
Question	1
A. Written declaration from the OEM	
B. Product Data Sheet (with reference to a standard that the adhesive has been tested to that is accepted by the Technical service)	
C. Presentation of sufficient test evidence that is acceptable to the Technical service for horizontal, vertical and melting behavior.	
D. Test the adhesive as part of a composite material for every material it will be used in combination with - and therefore form part of a component approval for horizontal vertical, and melting behavior.	

Question 2

In all cases should the R118 installation approval holder list as part of their information document the adhesive agents that they are permitted to use within the vehicle for Annex 6 & 8 approved components and Annex 7 approved components?

Suggested Answers

Type approving authority "e"	11
A. Yes	
B. Not required	

RESULTS -1 and -2: The UK: If a fire on a bus occurs, the burning behavior of the adhesives become an important factor and could in some cases lead to questioning the type-approval as a result. After consideration, it is decided that the discussion will be taken to the GRSG to be continued. France: it is an important issue, we will share our information with the UK.
Question 1; answers
A: The UK: No, Italy: Yes.
B: The UK: Possible.
C: The UK: Yes.
D: The UK, France and the Netherlands: Yes.
> No consensus is reached. The UK will prepare a proposal for the GRSG.
Question 2; answers
A: The UK, France and the Netherlands: Yes.
B: Italy: Not required.
> There is consensus on solution A.

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Regulation or Directive Number: UNECE Regulation 121.01

Subject: Identification of Controls

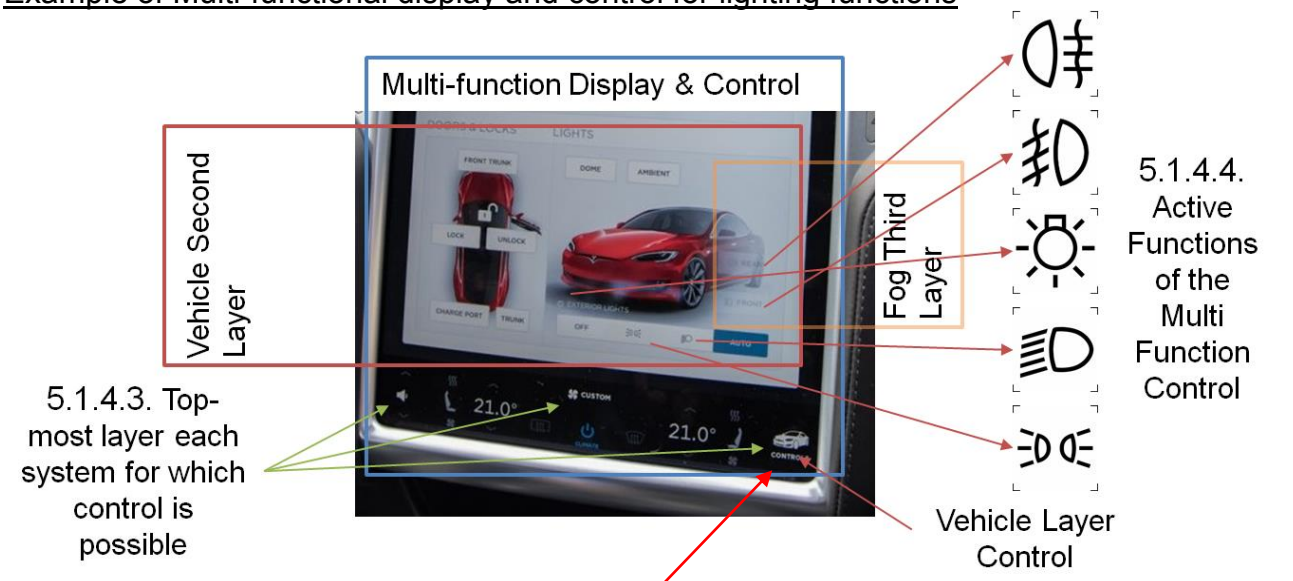
Legislation

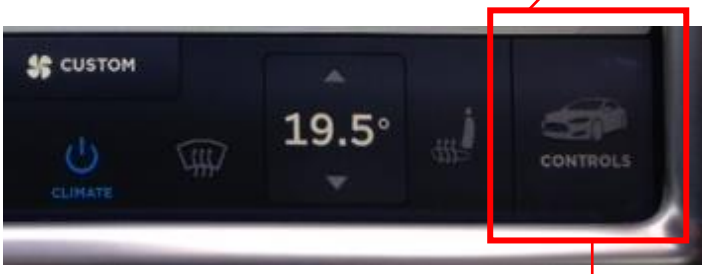
5.1.3.The identifications of tell-tales, indicators and controls shall be placed on or adjacent to the tell-tales, indicators and controls that they identify. In the case of multifunction control, the identifications need not be immediately adjacent. Nonetheless, they shall be as close as practicable to such multifunction control.

5.2.2. To identify a control, a tell-tale or an indicator not included in table 1 or ISO 2575:2004, the manufacturer may use a symbol of its own conception. Such symbol may include internationally recognized alphabetic or numeric indications. All symbols used shall follow the design principles laid down in paragraph 4. of ISO 2575:2004.

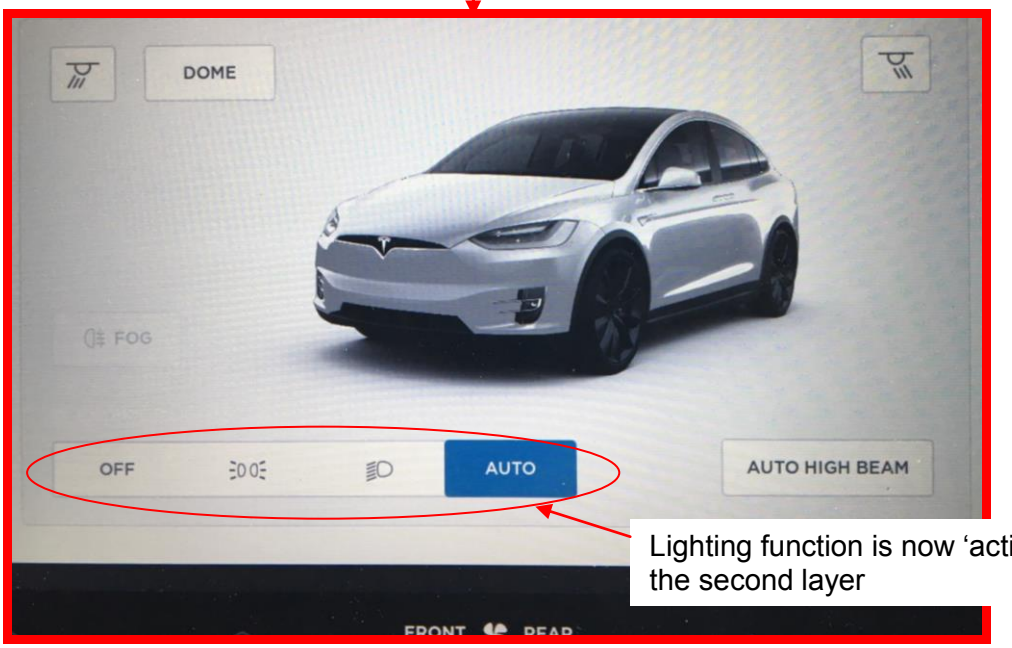
Discussion:

Example of Multi-functional display and control for lighting functions



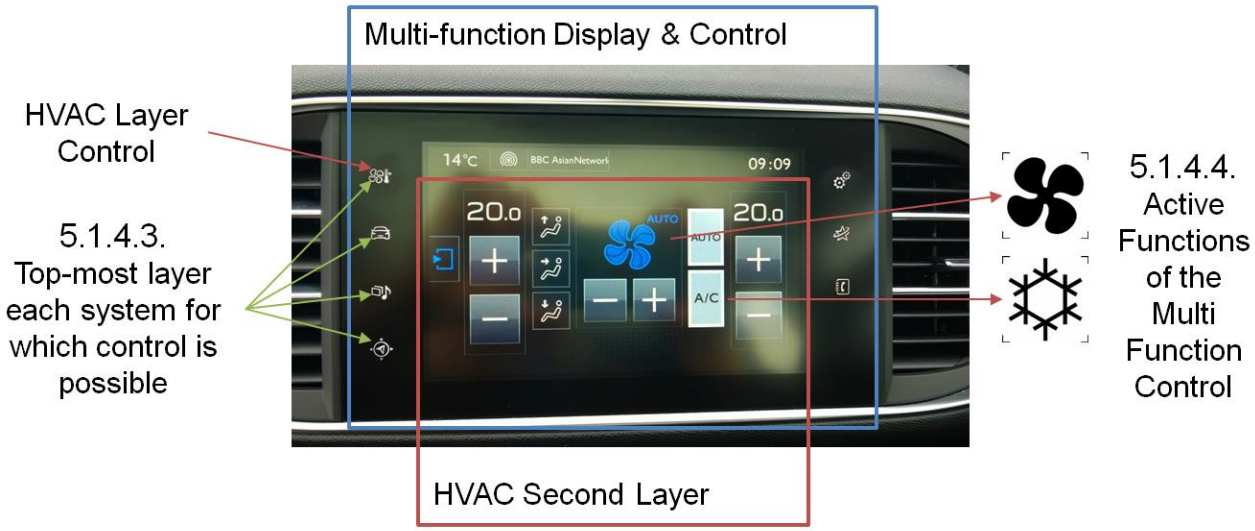


Vehicle master lighting, amongst other functions, is controlled via the multi-functional control.



Lighting function is now 'active' on the second layer

Example of Multi-functional display and control for HVAC functions:



Requirement 5.1.3. as it currently appears in UNECE 121 has not changed since the introduction of the Regulation in 2005 and does not consider a layered structure for a multi-function control.

Although multi-function controls and displays have converged into one, in the form of touch screen infotainment displays, there is the need to provide clarity on where the regulated table symbols should be shown in table 1 of R121.

Questions

1) For a multi-function control, is it only necessary to use the table 1 symbol when it is used as an input for the active function? Identification using the table 1 symbols is not required if selection of the multi-function control does nothing more than move the multi-task display to the next level.

Suggested Answers

Type approving authority "e"	11
Question 1	
A. Yes	X
B. No	

RESULT: The UK: it concerns information screens with multiple information levels as in the Tesla. The UK and Italy find solution A acceptable. The Netherlands also supports solution A; they have already approved the system. France accepts solution A but with concerns; the current text could lead to the conclusion that answer A is correct but we share the concerns with Germany on this subject. Belgium supports solution B. They propose that the lighting symbols should be on the top level. Germany also supports solution B, they would not approve this at this moment; different manufacturers have these ideas but we advice them not to follow this approach. The driver should always be able to use the lighting switch directly. With automatic lighting it could however be different. The UK will discuss the subject internally.
> No consensus is reached on the subject. The UK propose to take it to the GRSG or GRE.

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Regulation or Directive Number: UNECE Regulation 79.02.

Subject: Steering Equipment

Legislation

1. Scope

1.1. This Regulation applies to the steering equipment of vehicles of categories M, N and O.

1.2. This Regulation does not apply to:

1.2.1. Steering equipment with a purely pneumatic transmission;

1.2.2. Autonomous Steering Systems as defined in paragraph 2.3.3.;

1.2.3. Steering systems exhibiting the functionality defined as ACSF of Category B2, C, D or E in paragraphs 2.3.4.1.3., 2.3.4.1.4., 2.3.4.1.5., or 2.3.4.1.6., respectively, until specific provisions would be introduced in this Regulation.

Discussion:

The O2 series of amendments to Regulation 79 introduced for the first time categories of Automatically Commanded Steering Functions (ACSF). It defined these technologies and established technical requirements for those that were near to market. In so doing the speed limitation of no greater 10 km/h for an ACSF was relaxed for those steering functions that satisfied the new and specific technical requirements.

In addition, the 02 series of Amendments revised paragraph 1.2. the regulation to add those categories of ACSF for which the technical requirements have not yet been agreed and for which the Regulation does not apply.

Questions

1) If a vehicle is presented for approval with steering equipment which paragraph 1.2. makes clear the Regulation does not apply to, should approval to Regulation be denied?

Suggested Answers

Type approving authority "e"	11
Question 1	
A. Yes	
B. No	

RESULT: France, Germany, Italy, the Netherlands and the UK support A. > There is consensus on solution A.

Future of TAAM

Future of TAAM

During the TAAM meeting 28-29 June 2018 at Utrecht in The Netherlands, the Future of TAAM was being discussed.

The Netherlands:	Introduction by RDW The Netherlands, in which the present situation is explained. Do we continue in this form, do we consider TAAM to be useful, or not?
Italy:	Yes, we are positive, we find it useful and want to continue.
	The general (but limited) overall response is that the members agree with this standpoint.
The Netherlands:	How many times? How about the locations? Do we want a fixed chairman and secretary or do we want to take turns in fullfilling these roles?
Germany:	We propose a frequency of 2 times a year.
Belgium:	We have doubts. We did TAAM in 2012 and experienced it to be a lot of work.
The UK:	We find it a good idea to carry on the way we do now. Be carefull not to escalate the costs.
Estonia:	We find it a good idea if there is a fixed secretary. This is especially helpful for the small countries.
The Netherlands:	RDW in the Netherlands is willing to offer the chairman and the secretary if that is useful. How about the location? Is Geneva a good idea or by turn in different countries?
Belgium:	We are willing to organise the TAAM in Belgium in Namur (Namen, The capital of Wallonia) in 2019. It is close to Brussels (1 hr by train). We organise it on a low-cost basis.
The UK:	We have no problem to attend a meeting in Namur and we are in general eager to continue to particpate within the TAAM meetings.
The Netherlands:	How about the frequency? 1 or 2 times a year?
Iceland:	We prefer a fixed place for the autumn meeting and a changing place for the meeting in the spring.
Finland	A fixed location for the autumn meeting is a good idea. Let's plan for 4 TAAM meetings ahead.
The Netherlands:	We agree upon continuing, 2 times a year, at a fixed place in the autumn and an alternating place in the spring. Thank you Belgium for offering the alternating location in 2019. Is their a volunteer for organizing the next TAAM meeting in October? [There is no response]. A next meeting should be organised in any case before the Brexit date of (end of) March 2019. Let's see how far we can come, thank you all for participating.