



RDW

ETAES / TAAM – The Netherlands 2016

Grand Hotel Amrâth Kurhaus
2 - 4 May, 2016

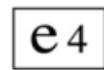
**TYPE APPROVAL AUTHORITIES
MEETING**

TAAM

Draft Meeting minutes



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1. Opening of the Meeting.

The chairman opens the meeting by welcoming all participants in The Hague on behalf of the management of RDW . New participants introduce themselves. The chairman announced that Jan Muns, who represented RDW in TAAM for over 10 years, deceased only one month ago. The chairman thanked Finland for giving RDW the opportunity to organize TAAM during the Dutch EU-presidency.

2. Adoption of the Agenda.

The agenda was adopted without amendments

3. Adoption of the minutes of Iceland (Spring 2015) Meeting.

RDW indicates that the conclusion on page 10 differs from the conclusion that was reached during the meeting. This is therefore back on the agenda today.

4. Short ETAES information.

The 26th ETAES meeting was chaired by Germany. The finances are in order so the rates don't have to be raised. The system is stable. DETA will start running in 2018. It is still under discussion if there also will be component approvals in DETA. The European Commission has to accept that. There was some discussion about the new framework directive (market surveillance and data exchange). Germany made a plea to jointly propose the format for the electronic information document and not just leave that to the Commission.

There will be emission approvals for heavy vehicles in DETA.

San Marino has requested access to ETAES.

**5. Follow up on questions from previous meetings (Paris)**

Question nr.	Conclusion
5.1	The meeting agreed with solution A
5.2	Question is transferred to the GRSG
5.3	Question is outdated and can be skipped
5.4	The meeting agreed with solution A
5.5	Question is transferred to the GRSG
6.1	Question is transferred to the TAAEG
6.2	The meeting agreed with solution B
6.3	Is on today's agenda
6.4	Is on today's agenda
6.5	The meeting agreed with solution A
6.6	The meeting agreed with solution 2
6.7	Question is transferred to the next TAAM meeting
6.8	The meeting agreed with solution A
6.9	Question is transferred to the TAAEG
6.10	The meeting agreed with solution B
6.11	The meeting agreed with solution B, but Q is transferred to TAAEG
6.12	Is on today's agenda
6.13	Is on today's agenda
6.14	The meeting agreed with solution B
6.15	Question is outdated and can be skipped
6.16	Question is outdated and can be skipped
6.17	Question is outdated and can be skipped
6.18	Question is outdated and can be skipped
6.19	Question is transferred to the next TAAM meeting
6.20	The meeting agreed with solution A (Q1), B (Q2) and A (Q3)
6.21	Is on today's agenda
7.1	The meeting agreed with solution A
7.2	The meeting agreed with solution C
7.3	The meeting agreed with solution A
7.4	Question is outdated and can be skipped
7.5	The meeting agreed with solution A
8.1	The meeting agreed with solution A (Q1), A (Q2) and A (Q3)



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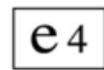
E4

e4

8.2	The meeting agreed with solution A
8.3	The meeting agreed with solution B
9.1	The meeting agreed with solution 2
9.2	No TAAM issue, Netherlands will take this to UN/ECE
9.3	The meeting agreed with solution 2 (Q1) and 1 (Q2)
9.4	The meeting agreed with solution 2
9.5	The meeting agreed with solution B
9.6	The meeting agreed with solution A
9.7	Question is transferred to the next TAAM meeting
9.8	The meeting agreed with solution C
9.9	Question is transferred to the next TAAM meeting



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6. Questions relating to framework Directive 2007/46/EC (motor vehicles):

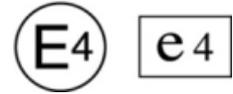
6.1	2007/46 N3G vehicles	<i>Germany 2</i>
6.2	2007/46 Width, length and height of SPV for Exceptional load transport vehicles	<i>Germany 7</i>
6.3	692/2008 dynamometer load settings and emission testing	<i>Germany 3</i>
6.4	1230/2012 masses and dimensions	<i>Germany 1</i>
6.5	ECE R44	<i>Germany 5</i>
6.6	2007/46 Individual Approvals article 24 paragraph 5	<i>France 1</i>
6.7	2007/46 Category O vehicles equipped with coupling device	<i>France 2</i>
6.8	ECE R13 Endurance braking for mass > 26t	<i>Italy 1</i>
6.9	2007/46 EC Small Series Type Approval	<i>Italy 2</i>
6.10	692/2008	<i>Sweden 1</i>
6.11	2007/46 definition of vehicle category	<i>Sweden 3</i>
6.12	2007/46 article 8.8	<i>Sweden 4</i>
6.13	ECE R105 ADR Agreement	<i>Finland 1</i>
6.14	2007/46, raising GVW in 2nd stage	<i>Finland 2</i>
6.15	2007/46, ECE R48, 661/2009	<i>Czech Republic</i>
6.16	ECE R16 Installation of ISOFIX fixtures	<i>Spain 4</i>
6.17	715/2007 PEMS families	<i>UK 2</i>
6.18	715/2007 RDE test	<i>UK 3</i>
6.19	2007/46 Mixed procedure	<i>Austria</i>
6.20	ECE R90 Replacement brake lining assemblies	<i>Poland</i>
6.21	2007/46 date of issue COC	<i>Slovakia 1</i>
6.22	78/2009 Pedestrian Protection	<i>Lithuania</i>

7. Questions relating to Regulation EU 168/2013:

7.1	134/2014 Replacement silencers	<i>Germany 4</i>
7.2	44/2014 Calculation of pay-mass	<i>France 3</i>
7.3	168/2013 manufacturers representative	<i>France 4</i>
7.4	168/2013 35 kW conversions	<i>Netherlands</i>
7.5	168/2013 and 44/2014, 97/24 anti-tampering	<i>Sweden 2</i>
7.6	168/2013 Test result sheets	<i>Spain 1</i>
7.7	168/2013 Label with manufacturer's address	<i>Spain 2</i>
7.8	168/2013 – 901/2014 Statutory plate	<i>Spain 3</i>
7.9	134/2014 Non-original replacement silencers	<i>UK 1</i>



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8. Questions relating to Regulation EU 167/2013:

- 8.1 167/2013 Definition “ R” and “S”**
- 8.2 167/2013 – 168/2013 Article 8**
- 8.3 167/2013 Classification of category**

Germany 8
Germany 6
Slovakia 2



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6.1 2007/46 N3G vehicles

Germany 2

KBA

1. Reference:

Framework Directive 2007/46/EC, Annex II, Part A, subparagraph 4.3. 4.3. M₃ or N₃ vehicles whose maximum mass exceeds 12 tonnes shall be subcategorised as off-road vehicles if they satisfy the condition set out in point (a) or both conditions set out in points (b) and (c):

(a) all their axles are **driven simultaneously**, irrespective of whether one or more powered axles can be disengaged;

(b) (i) at least half of the axles (or two axles out of the three in the case of a three axle vehicle and mutatis mutandis in the case of a five axle vehicle) is **designed to be driven simultaneously**, irrespective of whether one powered axle can be disengaged;

[...]

2. Issue:

During the last TAAM was discussed whether a vehicle with a hydraulic auxiliary drive suits to the definition in subparagraph 4.3. in part A of Annex II to 2007/46/EC.

In our point of view there was a common understanding regarding the hydraulic auxiliary drive, which were presented by the RDW. The presented hydraulic auxiliary drive does not change the category of the vehicle to N₃G.

A manufacturer contacted the KBA after the last TAAM and wants to have a type approval as a N₃G vehicle with a hydraulic auxiliary drive. To prevent disadvantages of competition the KBA would grant the type approval, because other type approval authorities categorized these vehicles also as an N₃G vehicle.

3. Interpretation (KBA)

Due to security aspects the KBA would recommend to categorize vehicles with a hydraulic auxiliary drive as an N₃ vehicle. For an N₃G vehicle is for example an AEBS (VO (EU) Nr. 347/2012), a LDWS (VO (EU) Nr. 351/2012), spray suppression systems (VO (EU) Nr. 109/2011), a front underrun protection (Directive 2000/40/EC) or electronic stability control systems (VO (EU) Nr. 661/2009) not required. To avoid circumventing the legislation, vehicles should be categorized with a hydraulic auxiliary drive as an N₃ vehicle. To prevent disadvantages of competition, all granted type approvals for vehicle with a hydraulic auxiliary drive should be withdrawn, if the member states agree on the point that a hydraulic auxiliary drive to not change the vehicle category to N₃G.

Question:

Should a vehicle with a hydraulic auxiliary drive be categorized as an off-road vehicle?



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Possibilities of solution

A	A vehicle with a hydraulic auxiliary drive is an off-road vehicle.
B	A vehicle with a hydraulic auxiliary drive is NOT an off-road vehicle. And it would make sense that all member states withdraw their type approvals.

Type approving authority "e" **1**

Selection of solution		accepted	refused
	A		X
	B	X	

Question is transferred to the TAAEG



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6.2 2007/46 Width, length and height of SPV for Exceptional load transport vehicles Germany 7

1. Reference:

Framework Directive 2007/46/EC, Annex XI, Appendix 6, item 48A in consideration of Regulation (EU) No. 1230/2012, Annex I - masses and dimensions Exceptional load transport vehicles may use exemptions according to footnote “A” of item 48A of Annex XI, Appendix 6.

Item	Subject	Reference to regulatory act	N ₃	O ₄
48	Masses and dimensions (other than vehicles referred to in item 44)	Directive 97/27/EC	X	X
48A	Masses and dimensions	Regulation (EC) No 661/2009 Regulation (EU) No 1230/2012	A	A

“A **The requirements shall be fulfilled to the greatest extent.** The type-approval authority may only grant exemption(s) if the manufacturer demonstrates that the vehicle cannot meet the requirements due to its special purpose. The exemptions granted shall be described on the vehicle type-approval certificate and the certificate of conformity (remark –entry 52).”

In Annex I to Regulation (EU) No. 1230/2012 is the permissible maximum length, width and height for vehicles of category N3 and O4 defined.

2. Issue:

Taken into account that the footnote “A” does not mention any permissible maximum value, the dimensions of those SPV would be only limited by technical reasons.

Due to security aspects the KBA would like to have a common understanding of the permissible maximum value for type approval of SPV.

Question:

Is it for example possible to grant a whole vehicle type approval (WVTA) for the category N3 or O4 including a width of 4 m?

Possibilities of solution



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A	Yes - The dimensions are not limited by the requirements of Annex XI. Granting a WVTA is possible even if the registration of vehicles with those dimensions is not possible in some member states.
B	No - A type-approved SPV shall be in each member state able to register without further testing or national obligation.

Type approving authority "e" 1

Selection of solution		accepted	refused
	A		X
	B	X	

The meeting agreed with solution B



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Germany 3

6.3 692/2008 dynamometer load settings and emission testing

1. Reference:

Regulation (EU) 692/2008

For emission testing, information for dynamometer load setting is required. It is to be given in Annex I, Appendix 3, Appendix to information document, No. 4

According to directive 2007/46/EC, technical services (TS) category A/B/D shall carry out or monitor themselves all kind of testing.

Although the manufacturer fills in the information document and its appendix, it is essential that a designated TS determines the load setting for the dynamometer (coasts itself or monitors the coasting). When monitoring, the technical service has to check conditions for coasting. With its signature under the test report for the whole vehicle, the TS confirms correctness of all data (including load settings).

2. Issue:

Considering that in practice settings will not be coasted for all variants and versions, the TS has also to define best and worst cases as well as further cases necessary to define an appropriate graph (curve) of settings.

In the recent past, the KBA got (vague) information that some TS accept load settings given by the manufacturer without or with insufficient further (double) checking or own testing/monitoring. TS are afraid that without doing so, the manufacturer will evade to other TS/other countries.



Question:

Is it acceptable to use manufacturer's data for dynamometer load settings without own testing/monitoring by a designated TS?

Possibilities of solution

Comments

A	Yes	
B	At least some data must be double checked	No further definition of size and methodology of sampling
C	No	All data necessary for reproducibility must be tested/monitored by the TS. The following must be recorded as a minimum: <ul style="list-style-type: none">• Methodology of finding "cases" (sampling)• Complete description of vehicles taken as sampling• Documentation of coasting and testing itself (place, conditions, equipment etc.)• In case of monitoring: suitability of used equipment, drivers etc. Without a doubt, records must confirm that settings (and other data) were found under control of the TS, and that this data was used for emission testing.

Type approving authority "e"	1
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Selection of solution		accepted	refused
	A		x
	B		x
	C	x	

The meeting agreed with solution C



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6.4 1230/2012 masses and dimensions

Germany 1

1. Reference:

In article 2 of the Regulation (EU) No 1230/2012 the following definitions are listed:

(2) 'standard equipment' means the basic configuration of a vehicle which is equipped with all the features that are required under the regulatory acts referred to in Annex IV and Annex XI to Directive 2007/46/EC, including all features that are fitted without giving rise to any further specifications on configuration or equipment level;

(3) 'optional equipment' means all the features not included in the standard equipment which are fitted to a vehicle under the responsibility of the manufacturer that can be ordered by the customer;

(4) 'mass in running order' means

(a) In the case of a motor vehicle:

the mass of the vehicle, with its fuel tank(s) filled to at least 90 % of its or their capacity/ies, including the mass of the driver, of the fuel and liquids, fitted with the standard equipment in accordance with the manufacturer's specifications and, when they are fitted, the mass of the bodywork, the cabin, the coupling and the spare wheel(s) as well as the tools;

(5) 'mass of the optional equipment' means the mass of the equipment which may be fitted to the vehicle in addition to the standard equipment, in accordance with the manufacturer's specifications;

Directive 2007/46/EC old version before Regulation (EU) No 1230/2012:

Annex I

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

2. Issue

To measure the CO₂ emissions pursuant to UN-R No. 101 it references to UN-R No. 83.

The masses of the vehicle are defined in this Regulation as followed:

2.2. "Reference mass" means the unladen mass of the vehicle increased by a uniform figure of 100 kg for test according to Annexes 4a and 8 to this Regulation.

2.2.1. "Unladen mass" means the mass of the vehicle in running order without the



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uniform mass of the driver of 75 kg, passengers or load, but with the fuel tank 90 per cent full and the usual set of tools and spare wheel on board, where applicable.

2.2.2. "Running order mass" means the mass described in paragraph 2.6. of Annex 1 to this Regulation and for vehicles designed and constructed for the carriage of more than 9 persons (in addition to the driver), the mass of a crew member (75 kg), if there is a crew seat amongst the nine or more seats.

Question:

How will be the optional equipment handled during the test procedure for CO₂ (eg. tank, air conditioning system, thicker windows etc.)

Question is transferred to the next TAAEG



RDW



Germany 5

6.5 ECE R44 different child-restraint systems in one type approval

1. Reference:

UN Regulation No. 44 Incorporating all valid text up to supplement 7 to the 04 series of amendments provides the following definitions for "Child-restraint type" and "Support leg":

2.19. "Child-restraint type" means child restraints which do not differ in such essential respects as:

2.19.1. The category, and the mass group(s) for which and the position and orientation (as defined in paragraphs 2.15. and 2.16.) in which the restraint is intended to be used;

2.19.2. The geometry of the child restraint;

2.19.3. The dimensions, mass, material and colour of:

- (a) The seat;
- (b) The padding; and
- (c) The impact shield;

2.19.4. The material, weave, dimensions and colour of the straps;

2.19.5. The rigid components (buckle, attachments, etc.).

2.11.1. "Support leg" means a permanent attachment to a child restraint creating a compressive load path between the child restraint and a vehicle structure in order to by-pass seat cushion effects during deceleration; a support leg may be adjustable.

2. Issue:

Some type-approvals granted by Kraftfahrt-Bundesamt (as well as some type-approvals granted by other European Type-Approval Authorities) ignore certain aspects of the definitions above.

There are approved types of child-restraint systems that facilitate more than one category (for instance universal and semi-universal) and that - depending on the changing mass group the child belongs to - may be used for different positions and orientations (for instance forward-facing and rearward-facing). Furthermore in some type-approvals there may be child-restraint systems facilitating different geometry and different rigid components such as buckles and attachments.

Some child-restraint systems can be modified by adding components. After this modification the child-restraint system can be used for a child that has outgrown the child restraint-system as it was before the modification.



For some of the modifications a support leg is attached or dismounted. This possibility seems not to be in line with section 2.11.1 that defines a support leg as "a permanent attachment".

For the time being to follow the proper procedure and to suggest a modification of UN Regulation No. 44 to the relevant working group in Geneva is not deemed to be a practical proceeding.

Question:

Do you think it is possible to grant and to accept type-approvals as they are described above without modifying UN Regulation No. 44?

Possibilities of solution

A	Yes
B	No

Type approving authority "e" **i**

Selection of solution		accepted	refused
	A	X	
	B		

The meeting agreed with solution A



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6.6 2007/46 Individual Approvals article 24 paragraph 5

France 1

Directive 2007/46, article 24 point 5

A Member State shall grant an individual approval if the vehicle conforms to the description appended to the application and satisfies the applicable technical requirements and shall without unjustified delay issue an individual approval certificate.

The format of the individual approval certificate shall be based on the template of the EC type-approval certificate set out in Annex VI and shall contain at least the information necessary to complete the application for registration provided for in Council Directive 1999/37/EC of 29 April 1999 on the registration documents for vehicles (1). Individual approval certificates shall not bear the heading 'EC vehicle approval'.

An individual approval certificate shall bear the vehicle identification number of the vehicle concerned.

Directive 2007/46, article 3 point 6

'individual approval' means the procedure whereby a Member State certifies that a particular vehicle, whether unique or not, satisfies the relevant administrative provisions and technical requirements ;

Directive 2007/46, article 3 point 19

'incomplete vehicle' means any vehicle which must undergo at least one further stage of completion in order to meet the relevant technical requirements of this Directive;

As said in the definition of 2007/46, an incomplete vehicle must undergo another stage to satisfy the technical requirements and to be registered.

QUESTION :

Can a Member State grant an individual approval if the vehicle is incomplete

ANSWERS :

Answer A	YES	
Answer B	NO	X

The meeting agreed with solution A, it's possible to grant an individual approval for an incomplete vehicle, Member states are not obliged to register such a vehicle



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6.7 2007/46 Category O vehicles equipped with coupling device

France 2

Directive 2007/46/EC, Annex II, Part A, Point 5.

The point referred above specifies that type-approval shall not be granted to converter dolly. A converter dolly is a category O vehicle equipped with a fifth wheel kingpin enabling to support a semi-trailer in order to turn it into a trailer.

QUESTION :

Is it possible to grant a WVTA for an O4 trailer or an O4 semi-trailer equipped with a coupling device or a fifth wheel kingpin (which would tow another trailer or semi-trailer) when the values indicated at Point 2.11 or 2.16.4 allow it ? The group would result in a combination of 3 vehicles.

OUR INTERPRETATION :

In annex III of the 2007/46 "INFORMATION DOCUMENT FOR THE PURPOSE OF EC TYPE-

APPROVAL OF VEHICLES - PART I - B. Category O" there is not a point 2.11 for the trailers, but there is the point 2.16.4 : « Intended registration/in service maximum permissible towable mass.

And the point 2.11 exist in the regulation 1230/2012 (masses and dimension) ANNEX V - PART A - INFORMATION DOCUMENT

§ « 2.11. Technically permissible maximum towable mass of the towing vehicle

In case of:

2.11.1. Drawbar trailer: ...

2.11.2. Semi-trailer: ...

2.11.3. Centre-axle trailer: ...

2.11.4. Rigid drawbar trailer: ...

2.11.4.1. Maximum ratio of the coupling overhang (j) to the wheel base: ...

2.11.4.2. Maximum V-value: ... kN.

2.11.5. Technically permissible maximum laden mass of the combination: ...

2.11.6. Maximum mass of unbraked trailer: ... »

In the case of trailer or semi-trailer, the trailer with a coupling device or a fifth wheel kingpin is the towing vehicle.

If you agree with us and it seems possible for you to grant a WVTA for an O4 trailer or an O4 semi-trailer equipped with a coupling device or a fifth wheel kingpin, it could be better to add a point 2.11 in the WVTA's information document and/or complete the point 2.16.4 : « Intended registration/in



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service maximum permissible towable mass (several entries possible for each technical configuration (5)) »

This type of vehicle is used for exceptional load transport or showman's vehicle.

SUGGESTED ANSWERS:

Solution	Accepted	Refused	
A	Answer for the coupling device	X	
B	Answer for the fifth wheel kingpin	X	

**Both A and B are refused, WVTA legislation has to be modified for this.
Member states can grant a national approval.**



6.8 ECE R13 Endurance braking for mass > 26t

SUBJECT: Endurance braking for mass > 26t.

QUESTION:

Endurance braking requirements, as per Annex 4 to UN R.13, are:

1.8. Type-IIA test (endurance braking performance)

1.8.1. Vehicles of the following categories shall be subject to the Type-IIA test:

.....

1.8.1.2. Vehicles of category N3 which are authorized to tow a trailer of category O4.

If the maximum mass exceeds 26 tonnes, the test mass is limited to 26 tonnes or, in the case where the unladen mass exceeds 26 tonnes, this mass is to be taken into account by calculation.

.....

1.8.2. Test conditions and performance requirements

1.8.2.1. The performance of the endurance braking system shall be tested at the maximum mass of the vehicle or of the vehicle combination.

Does the 26t limit refer to the mass of the N3 vehicle only or to the test mass of the combination of a N3 vehicle plus its O4 trailer ?

REMARKS:

Type approving authority "e"	3
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Selection of solution		accepted	refused
26t limit apply to GVW of the N3 vehicle only, the combination is not limited to 26t (e.g. combination can be up to 44t)	A	X	
26t limit applies to the combination of a N3 vehicle with its O4 trailer, the GCW of the combination is limited to 26t	B		X

The meeting agreed with solution A



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6.9 2007/46 EC Small Series Type Approval

Italy 2

SUBJECT: EC small series type-approval.

QUESTION:

Vehicles shall comply with the regulatory acts listed in Annex IV of the Directive 2007/46/EC. For type-approval of EC small series some flexibilities are allowed, as like the partial application of UN and/or EU Regulations.

In particular, according to 2007/46/EC Annex IV Appendix 1 (EC type-approval of small series), the type-approval of vehicles fitted with an air-conditioning system containing fluorinated greenhouse gases with a global warming potential higher than 150 are permitted until 31st of December 2016. This deadline refers specifically to type-approvals, not to vehicle registration. Moreover the 2006/40/EC type-approval certificate is not required (letter "A").

After 31st December 2016, do EC small-series approval granted before 31st December 2016 to vehicle types fitted with an air-conditioning system containing fluorinated greenhouse gases with a global warming potential higher than 150, remain valid and a new vehicles can continue to be registered and put into service?

REMARKS:

Also Directive 2000/53/EC concerning end-of-life vehicles, where it establishes derogations for some particular situation (Annex II) it speaks about type approval date and does not restrict the registration nor the entrance into service of vehicles bearing a valid type-approval.

Moreover, the EC small-series type-approval allows some other "exemptions", e.g. the fitting of ESC, BAS and TPMS is not required

Type approving authority "e"	3
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Selection of solution		accepted	refused
After 31 st December 2016, EC small-series approvals granted before 31 st December 2016 to vehicle types fitted with an air-conditioning system containing fluorinated greenhouse gases with a global warming potential higher than 150, remain valid and new vehicles can continue to be registered and put into service.	A	X	
After 31 st December 2016, EC small-series approvals granted before 31 st December 2016 to vehicle types fitted with an air-conditioning system containing fluorinated greenhouse gases with a global warming potential higher than 150, <u>do not</u> remain valid and new vehicles <u>can not</u> continue to be registered and put into service.	B		X

Question is transferred to the next TAAEG



6.10 692/2008 CO₂-monitoring

SUBJECT: CO₂-monitoring

DIRECTIVE: 692/2008/EC, 443/2009/EC

RELEVANT SECTION:

QUESTION:

With the introduction of the WLTP into 692/2008 through Annex XXI the CO₂-value will differ from the value determined through the former test procedure. CO₂-monitoring requirements are based on the old test procedure. The Commission is therefore developing a Correlation tool to correlate WLTP CO₂-values to a value applicable for CO₂-monitoring. This correlation tool should be introduced for type approval purposes to determine the correlated CO₂-value and shall be presented in the emissions approval documentation. In the end it's foreseen two CO₂-values on the CoC, one for WLTP and one correlated for CO₂-monitoring.

One issue that is not addressed at this stage is where in the type-approval process this should be achieved. The correlation tool will convert WLTP test data into a CO₂-value representative for CO₂-monitoring purposes. Therefore we would like to make an inventory on the point of view of the other TAA's.

A	Is the correlation tool to be used by TAA's, based on results in the test report from the technical service and to be presented in the type approval certificate?
B	Is the correlation tool to be used by the technical service and presented in the test report?
C	Is it to be decided by each MS?

Type approving authority "e"	5
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Selection of solution		accepted	refused
	A		
	B		
	C		

Question is transferred to the next TAAM meeting



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Sweden 3

6.11 2007/46 definition of vehicle category

TAAM QUESTION 3 , from Sweden for TAAM 2016-05-03 – 04

SUBJECT:

Definition of vehicle category, a new discussion about Question from Sibiu 2010-09-22 (5.4 Sweden 1)

DIRECTIVE:

2007/46/EC Annex II, Parts A and C

PROBLEM:

Do you have a different view about the interpretation of the new Annex II from 2011, in this question?

THE OLD QUESTION FROM SIBIU:

RELEVANT SECTIONS:

Part A

2. Category N: Motor vehicles with at least four wheels designed and constructed for the carriage of goods.

5.1. 'Motor Caravan' means a special purpose M category vehicle constructed to include living accommodation which contains at least the following equipment:

- seats and table,*
- sleeping accommodation which may be converted from the seats,*
- cooking facilities, and*
- storage facilities.*

This equipment shall be rigidly fixed to the living compartment; however, the table may be designed to be easily removable.

Part C

Passenger cars (M1)

AA Saloon ISO Standard 3833-1977, term No 3.1.1.1, but including also vehicles with more than four side windows.

AB Hatchback Saloon (AA) with a hatch at the rear end of the vehicle.

AC Station wagon ISO Standard 3833-1977, term No 3.1.1.4 (estate car)

AD Coupé ISO Standard 3833-1977, term No 3.1.1.5

AE Convertible ISO Standard 3833-1977, term No 3.1.1.6

L 263/68 EN Official Journal of the European Union 9.10.2007



AF Multi-purpose vehicle

Motor vehicle other than those mentioned in AA to AE intended for carrying passengers and their luggage or goods, in a single compartment.

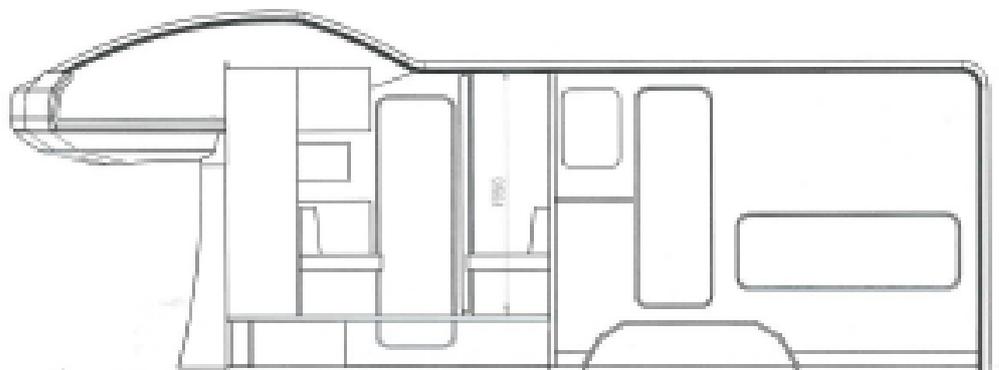
PROBLEM:

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

QUESTION:

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

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



Living area in one compartment

Loading area in a separate compartment

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



NEW QUESTION:

Since the change of annex II in 2007/46/EC in 2011, have the point of view changed or is TAAM still of the meaning that its "case by case".

A	Case by case
B	Other conclusion

Type approving authority "e"	5
------------------------------	---

Selection of solution		accepted	refused
	A		
	B		

The meeting agreed with solution A



6.12 2007/46 article 8.8

SUBJECT: Requesting documentation

DIRECTIVE: 2007/46, Article 8.8

RELEVANT SECTION:

8. If so requested by another Member State, the Member State which has granted an EC type-approval shall, within 20 working days of receiving that request, send a copy of the EC type-approval certificate in question, together with the attachments. The hard copy may be replaced by an electronic file.

QUESTION:

If another Member State requests a type-approval. What do you send?

A	I send only the certificate of the type-approval.
B	I send some selected parts of the type-approval and the certificate.
C	I send all the documentation to the requesting Member State. Because there should not be any privacy between the approval authorities.
D	Other suggestions?

Type approving authority "e"	5
------------------------------	---

Selection of solution		accepted	refused
	A		
	B		
	C		
	D		

The meeting agreed with solution C, information will only be sent to the TAA's



RDW



Finland 1

6.13 ECE R105 ADR Agreement

SUBJECT: Searching for best practice for checking the ADR requirements **UN/ECE 105, ADR Agreement**

REFERENCES (DIRECTIVE/ANNEX/ETC):

UNECE regulation 105

Requirements according to regulation 105 are in the scope of framework directive 2007/46/EC, and they can be checked in the vehicle type-approval process.

European Agreement concerning the International Carriage of Dangerous Goods by Road, PART 9

Definitions:

"Type-approved vehicle" means any vehicle which has been approved in accordance with ECE Regulation No. 105.

"ADR approval" means certification by a competent authority of a Contracting Party that a single vehicle intended for the carriage of dangerous goods satisfies the relevant technical requirements of this Part as an EX/II, EX/III, FL, OX, or AT vehicle or as a MEMU.

9.1.2.1

Every complete or completed vehicle shall be subjected to a first inspection by the competent authority in accordance with the administrative requirements of this Chapter to verify conformity with the relevant technical requirements of Chapters 9.2 to 9.8.

The competent authority may waive the first inspection for a tractor for a semi trailer type-approved in accordance with 9.1.2.2 for which the manufacturer, his duly accredited representative or a body recognised by the competent authority has issued a declaration of conformity with the requirements of Chapter 9.2.

The conformity of the vehicle shall be certified by the issue of a certificate of approval in accordance with 9.1.3.

9.1.2.2 Requirements for type-approved vehicles

At the request of the vehicle manufacturer or his duly accredited representative, vehicles subject to ADR approval according to 9.1.2.1 may be type-approved by a competent authority. The relevant technical requirements of Chapter 9.2 shall be considered to be fulfilled if a type approval certificate has been issued by a competent authority in accordance with ECE Regulation No. 105 provided that the technical requirements of the said Regulation correspond to those of Chapter 9.2 of this Part and provided that no modification of the vehicle alters its validity. In the case of MEMUs, the type approval mark affixed in accordance with ECE Regulation No. 105 may identify the vehicle as either MEMU or EX/III. MEMUs need only be identified as such on the certificate of approval issued in accordance with 9.1.3.



RDW



This type approval, granted by one Contracting Party, shall be accepted by the other Contracting Parties as ensuring the conformity of the vehicle when the single vehicle is submitted for inspection for ADR approval.

At the inspection for ADR approval, only those parts of the type-approved incomplete vehicle which have been added or modified in the process of completion shall be inspected for compliance with the applicable requirements of Chapter 9.2.

9.1.3 Certificate of approval

9.1.3.1 Conformity of EX/II, EX/III, FL, OX and AT vehicles and MEMUs with the requirements of this Part is subject to a certificate of approval (certificate of ADR approval) issued by the competent authority of the country of registration for each vehicle whose inspection yields satisfactory results or has resulted in the issue of a declaration of conformity with the requirements of Chapter 9.2 in accordance with 9.1.2.1.

Additional requirements

Chapters 9.3 – 9.8.

QUESTION/PROBLEM/CONCERN:

According to ADR regulations also type approved vehicle has to be checked individually and an ADR certificate for an individual vehicle shall be issued. At least in Finland this leads to situation in which already type approved vehicle has to be taken to the inspection station. This leads manufacturers to choose IVA instead of type approval in case of large series of ADR regulated vehicles.

Have you had this same problem in your country and/or do you have already more streamlined process to conduct the necessary checks and issue an ADR certificate for a type approved vehicle?

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

		e17	
		Accepted	Rejected
A	All ADR requirements can be checked in the vehicle type-approval process.		
B	Certificate of ADR approval can be issued based on whole vehicle type approval		
C	Certificate of ADR approval can be issued based on additional checks conducted during the whole vehicle type approval process		
D	Only requirements of UNECE regulation 105 can be checked in the vehicle type-approval process.		
E	Every individual vehicle has to be inspected to meet the ADR requirements.		

Comments:

No decision has been taken, must be decided on a national level



RDW



Finland 2

6.14 2007/46, raising GVW in 2nd stage

SUBJECT: Raising the technically permissible maximum laden mass of a vehicle in a second stage approval 2007/46/EC

REFERENCES (DIRECTIVE/ANNEX/ETC):

EU regulation 1230/2012

Definitions:

'technically permissible maximum laden mass' (M) means the maximum mass allocated to a vehicle on the basis of its construction features and its design performances; the technically permissible laden mass of a trailer or of a semi-trailer includes the static mass transferred to the towing vehicle when coupled;

'technically permissible maximum mass on the axle' (m) means the mass corresponding to the maximum permissible static vertical load transmitted to the ground by the wheels of the axle, on the basis of the construction features of the axle and of the vehicle and their design performances;

TAAM multi-stage subgroup:

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

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

QUESTION/PROBLEM/CONCERN:

Is there any requirements for vehicle's nonregulated parts as axles, frame, etc..., if the second stage manufacturer wants to raise the masses permitted in the first stage type-approval and every separate regulation requirement affected by the changes according to annex IV of the framework directive 2007/46/EC is fulfilled?

So we would like to hear, if you see any further requirements in addition to separate regulations according to annex IV?

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

		e17	
		Accepted	Rejected
A			
B			
C			

Comments:

No decision has been taken, manufacturers of all stages have to agree with the higher masses



RDW



6.15 2007/46, ECE R48, 661/2009

Czech Republic

Directive or Regulation												
UNECE Regulation No. 48 Directive 2007/46/EC Regulation (EC) 661/2009												
Legislation basis												
Requirements of Directive 2007/46/EC, Annex IV												
20A	Installation of lighting and light-signalling devices on vehicles	Regulation (EC) No 661/2009 UNECE Regulation No 48	X	X	X	X	X	X	X	X	X	X
Requirements of Regulation (EC) 661/2009												
48	Installation of lighting and light-signalling devices on motor vehicles	05 series of amendments	OJ L 323, 6.12.2011, p. 46.				M, N, O					
Requirements of UNECE Regulation No. 48												
6.7. Stop lamp (Regulation No.7)												
6.7.1. Presence												
Devices of S1 or S2 categories: mandatory on all categories of vehicles.												
Devices of S3 or S4 category: mandatory on M ₁ and N ₁ categories of vehicles, except for chassis-cabs and those N ₁ category vehicles with open cargo space; optional on other categories of vehicles.												
6.7.2. Number												
Two S1 or S2 category devices and one S3 or S4 category device on all categories of vehicles.												
Issue												
<p>Recently we have obtained questions regarding the above stated definition of mandatory use of third stop lamp on multi-stage approved completed vehicles category N1.</p> <p>The manufacturer's in second stage which produce superstructures for small commercial vehicles based on incomplete chassis cab vehicles receive mixed signals as for the need of third stop lamp. At first sight the issue might look quite simple, however there are several inconsistencies:</p> <ul style="list-style-type: none"> a) several producers of the incomplete chassis cabs have stated that there is no option to order chassis cab vehicle from them which would have cable preparation for third stop lamp but they deem the first stage warranty void when the second stage producer uses another cables for mounting the third stop lamp and there is also danger of damage of vehicle ECU b) small trucks in N2 category which are from the technical point of view the same as the N1 trucks do not have to be equipped by such lamp c) we are not discussing only the box bodies superstructures but also the other closed types of bodies, e.g. small tanks d) we have seen bodies approved with the third stop lamp as well as those approved without it, which means that there is no unified approach of the authorities 												



RDW



Examples of vehicles in question:



Photo 1: Iveco Daily, category N1



Photo 2: Mercedes Sprinter, category N1



Photo 3: Mercedes Sprinter, category N1

Questions:

1) What is your approach regarding the third stop lamp for multi-stage completed vehicles of category N1?

Possible solutions:

		Solution	Comment
1	A	Completed vehicle N1 means completed chassis cab and therefore third stop lamp is not mandatory for multi-stage approved vehicles, UNECE Regulation No. 48 excludes these vehicles.	Wording of UNECE Regulation excludes chassis cab vehicles and this applies also to completed vehicles throughout multi-stage approval process, vehicles in photos 1 and 3 above does not have to be equipped by third stop lamp. Intention of the UNECE Regulation No. 48 was to make third stop lamp mandatory for integrated closed (furgon) bodies as depicted in Photo 2 above.
	B	All completed vehicles N1 with closed bodies must be equipped by third stop lamp. This was the intention of the UNECE Regulation No. 48.	Wording of UNECE Regulation simply excludes only open cargo space and incomplete chassis cabs. All vehicles depicted above shall be equipped by third stop lamp.
Type approval authority „e“		8	
Selection of solution		accepted	refused
1	A	X	
	B		X

The meeting agreed with solution B, manufacturers of all stages should solve this together



6.16 ECE R16 Installation of ISOFIX fixtures

Spain 4

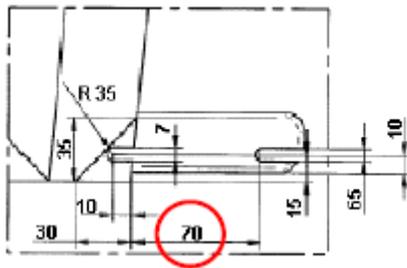
Directive or Regulation number
UN/ECE R16.06 Vehicles equipped with safety-belts, safety-belt reminder, restraint systems, child restraint systems and ISOFIX child restraint systems.
Subject:
Item 8.3.5 Installation of ISOFIX fixtures

Text:
<p>1.2. Test method</p> <p>8.3.5. In order to inform vehicle user(s) of the provisions made for the transport of children, vehicles of Categories M1, M2, M3 and N1 shall meet the information requirements of Annex 17. Any vehicle of Category M1 shall be equipped with ISOFIX positions, in accordance with the relevant prescriptions of Regulation No. 14.</p> <p>The first ISOFIX position shall allow at least the installation of one out of the three forward-facing fixtures as defined in Appendix 2 of Annex 17; the second ISOFIX position shall allow at least the installation of one out of the three rear-facing fixtures as defined in Appendix 2 of Annex 17. For this second ISOFIX position, in case where the installation of the rear-facing fixture is not possible on the second row of seats of the vehicle due to its design, the installation of one out of the six fixtures is allowed in any position of the vehicle.</p>
Concern:
<p>The drawings of the fixtures with the measurements are defined in the Regulation 16 ANNEX 17 – APPENDIX 2.</p> <p>The ISOFIX attachment is 70mm long.</p>

Question:			
Is the ISOFIX attachment allowed to slide inside the fixture to install it in the vehicle?			
Solution:		Accepted	Refused
A	Yes, the ISOFIX is possible to slide inside the fixture.	X	
B	No, the ISOFIX attachment should be fixed.		X
Authority:			



RDW



The meeting agreed with solution A



RDW



UK 2

6.17 715/2007 PEMS families

Subject: PEMS Family for Real Driving Emissions

Legislation

Appendix 7, Selection of vehicles for PEMS testing at initial type approval

1. INTRODUCTION

Due to their particular characteristics, PEMS tests are not required to be performed for each “vehicle type with regard to emissions and vehicle repair and maintenance information” as defined in Article 2(1) of this Regulation, which is called in the following “vehicle emission type”. Several vehicle emission types may be put together by the vehicle manufacturer to form a “PEMS test family” according to the requirements of point 3, which shall be validated according to the requirements of point 4.

3. PEMS TEST FAMILY BUILDING

A PEMS test family shall comprise vehicles with similar emission characteristics. Upon the choice of the manufacturer vehicle emission types may be included in a PEMS test family only if they are identical with respect to the characteristics in points 3.1 and 3.2.

3.1. Administrative criteria

3.1.1. The approval authority issuing the emission type approval according to Regulation (EC) 715/2007.

3.1.2. A single vehicle manufacturer.



Discussion

We have been approached by a technical service to allow PEMS test results from one OEM to be used for a second OEM when the vehicles are technically the same as described in 3.2 Annex 7 of 2016/427. For example when a VW Golf and a Seat Leon have the same engine.

We have been told some member states have already allowed this so we want to clarify the issue.

The VCA feel the regulation is clear and different manufacturers and different approval authorities cannot be grouped into the same PEMS test family even if the vehicles share the same drivetrain.

Correct examples:

Seat and Skoda are two different manufacturers so are two different families.

Seat use at least two different approval authorities so will have at least two families.

Question 1

The VCA would like to confirm other member states are in agreement with our view and that the wording of 3.1.1 & 3.1.2 should be followed?

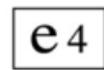
Suggested Answers:

Type Approval Authority "e"	11	
	Accepted	Refused
A. yes		
B. No		
C. Other		

Both A and C. If vehicles are identical the results of one PEMS test can be used for more than one test report.



RDW



UK 3

6.18 715/2007 RDE test

Subject: Real Driving Emissions test routes.

Legislation

Pre-ambble

(7) An individual RDE test at the initial type-approval cannot cover the full range of relevant traffic and ambient conditions. Therefore in-service-conformity testing is of utmost importance for ensuring that a widest possible range of such conditions is covered by a regulatory RDE test, thereby providing for compliance with the regulatory requirements under all normal conditions of use.

4. GENERAL REQUIREMENTS

4.1. The RDE performance shall be demonstrated by testing vehicles on the road operated over their normal driving patterns, conditions and payloads. The RDE test shall be representative for vehicles operated on their real driving routes, with their normal load.

4.2. The manufacturer shall demonstrate to the approval authority that the chosen vehicle, driving patterns, conditions and payloads are representative for the vehicle family. The payload and altitude requirements, as specified in points 5.1 and 5.2, shall be used ex-ante to determine whether the conditions are acceptable for RDE testing.

4.3. The approval authority shall propose a test trip in urban, rural and motorway environments meeting the requirements of point 6. For the purpose of trip selection, the definition of urban, rural and motorway operation shall be based on a topographic map.

6.8. The average speed (including stops) of the urban driving part of the trip should be between 15 and 30 km/h. Stop periods, defined as vehicle speed of less than 1 km/h, shall account for at least 10 % of the time duration of urban operation. Urban operation shall contain several stop periods of 10 s or longer. The inclusion of one excessively long stop period that individually comprises >80 % of the total stop time of urban operation shall be avoided.



RDW



7. OPERATIONAL REQUIREMENTS

7.4. RDE tests shall be conducted on working days as defined for the Union in Council Regulation (EEC, Euratom) No 1182/71 (1).

7.5. RDE tests shall be conducted on paved roads and streets (e.g. off-road operation is not permitted).

Discussion



We have been approached by a technical service to allow the urban part of the RDE test to be carried out on a route around a residential area where they drive the same loop 8 times. The proposed route does meet all of the trip requirements and includes artificial stops to replicate urban traffic and meet the idle time requirement.

We feel that the proposed route doesn't take into account the full range of urban environments and therefore is not fully representative of all types of urban driving. RDE is meant to mirror real world conditions and standardising a route like this moves things back towards controlled conditions. We also feel this route doesn't comply with 4.1 in the way that it is neither a normal driving pattern nor a real driving route.



RDW



Question 1

The VCA feel that the loop route is not appropriate and not in the spirit of the regulation and we would like to confirm other member states agree with our view?

Suggested Answers:

Type Approval Authority "e"	11	
	Accepted	Refused
A. yes		
B. No		
C. Other		

It is decided that this should be judged on an case by case basis



RDW



Austria

6.19 2007/46 Mixed procedure

Directive 2007/46/EC, Information Document according to Annex III, mixed procedure

In the case of a mixed procedure for EC-WVTA the information provided in Annex III Part I shall be given and in addition the type-approval numbers of "system approvals" shall be indicated in Part III.

Austria has received a WVTA file with information document according to Annex III of 2007/46. In this information document the tyres and wheels are indicated as shown below:

6.2.4.	Air-suspension for non-driving axle(s): yes/no yes / no
6.2.4.1.	Suspension of non-driving axle(s) equivalent to air-suspension: yes/no yes / no
6.6	Tyres and wheels: Refer to e4*458/2011*458/2011*0100

There is no other information on tyre and wheel dimensions, load indices etc. in the information document, the system approval as referred to in 6.6. is not annexed to the information document and not included in the approval file as distributed via ETAES.

As consequence such essential information not available for the other MS without the need of special request.

Question:

Is it allowed to refer in the information document according to Annex III, Part I of Directive 2007/46/EC to system approvals only without indication of the values and without appending the referred system approvals to the information document?

If this approach is allowed the information document for a trailer of Category O1 may be shortened to a document like this:

Company XYZ – Information Document According to Annex III
Part I:
0.1. to 1.4: see e12*109/2011*2015/166*0123*
2.1 to 5.5: see e12*1230/2012*1230/2012*0123*02
6.2 to 6.6.2.2: see e12*458/2011*458/2011*0123*01
7.2. to 8.9: N/A
9.1. see e12*1230/2012*1230/2012*0123*02
9.17 to 9.17.4.2: see e12*19/2011*249/2012*0123*01
11.1 to 11.5: see E12 55R-01 1234
Part II:
See e12*109/2011*2015/166*0123*

[followed by the table according to Part III]

Note: it's not required to attach the system approvals referred to the type-approval file sent to the other member states!



RDW



With such documentation it's not possible to register vehicles or to make any conformity check (e.g. at periodical technical inspection).

Solutions:

- A: All data stipulated in the information document according to Annex III must be included in the information document. If references to system approvals or UNECE approvals are included in Part I of the information document instead of value indications, drawings etc. these referred documents must be annexed to the information document or to the type-approval file.
- B: It's allowed to refer to system approvals or UNECE–approvals only without giving any detailed information.

e12:

Option	Yes	No
A	X	
B		X

The meeting agreed with solution A



RDW



6.20 ECE R90 Replacement brake lining assemblies

Poland

SUBJECT: UN Regulation No. 90 - replacement brake lining assembly and drum brake linings.

Background:

The Regulation applies to four basic braking functions. In accordance with paragraph 4.2.2., the replacement parts are divided as follows:

- A - replacement brake lining assembly,
- B - replacement drum brake lining,
- C - replacement brake disc,
- D - replacement brake drum.

Question / Concern:

Question: Is the index B correct to identify the replacement brake lining assembly intended for drum brake, in accordance with the above mentioned provisions?

Concern: The wording of relevant sections of the Regulation devoted to component marking seems clear and precise, however it is a common practise that many type-approval authorities seem to misuse them. Hence, this intervention is only meant to restore a correct marking practise.

Proposed solutions:

A	Index A - should be intended to identify type of approval: <ol style="list-style-type: none"> 1. for the replacement brake lining assembly to disc brakes, 2. for the replacement brake lining assembly to drum brakes. Index B - should be intended to identify type of approval only for a riveted replacement drum brake lining.
B	Index A is reserved only for the replacement brake lining assembly to disc brakes. Index B is reserved for the replacement brake lining assembly to drum brakes together with the riveted replacement drum brake lining.
C	There are other reasons / circumstances, where such component type-approval should be granted (please specify).

TAA code: „E” 20

Selection of solution		accepted	refused
	A	X	
	B		X
	C		X

The meeting agreed with solution A



RDW



6.21 2007/46 date of issue COC

Slovakia 1

Directive or Regulation number:
2007/46/EC,
Subject:
COC – date of issue

Reference to Annex, etc in the Directive or Regulation:
Directive 2007/46/EC, Article 3, Article 18, ANNEX IX

Text:
<p>Definition in Article 3 of Directive 2007/46/EC: 'certificate of conformity' means the document set out in Annex IX, issued by the manufacturer and certifying that a vehicle belonging to the series of the type approved in accordance with this Directive complied with all regulatory acts at the time of its production.</p> <p><u>Article 18 of Directive 2007/46/EC</u> 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.</p> <p><u>Directive 2007/46/EC, ANNEX IX</u> The certificate of conformity is a statement delivered by the vehicle manufacturer to the buyer in order to assure him that the vehicle he has acquired complies with the legislation in force in the European Union at the time it was produced. The certificate of conformity also serves the purpose to enable the competent authorities of the Member States to register vehicles without having to require the applicant to supply additional technical documentation.</p> <p>In our opinion, according to the text of Dir. 2007/46/ES, manufacturer has to issue a COC where the date of issue of the COC will be indicated the date of production of the vehicle because the COC certifying compliance with all applicable legal requirements at the time of production of the vehicle.</p> <p>By indicating other date than the date of production of the vehicle manufacturer is deceiving customers especially in the case of end-of-series vehicles. In such case the vehicle meets the current applicable legislative requirements at the time of production, but at the time of a sale the vehicle no longer fulfills all applicable legal requirements and therefore it is possible to registered it only under the provisions for end-of-series vehicles or the vehicle cannot be register at all.</p> <p>For example, the manufacturer ŠKODA AUTO issued the COC for the vehicle that complains with 715/2007*630/2012J (Euro 5b) emission and the EC-type approval of this vehicle expired according to Article 17 paragraph 1 subparagraph a) of Directive 2007/46/EC on 31.08.2015.</p> <p>However, the manufacturer issued COC dated of 18.09.2015. By issuing the COC with mentioned date the manufacturer declared that the vehicle complains all applicable legal requirements but EC-type approval of this vehicle had expired and the vehicle could not be registered.</p>



RDW



Question:
Which date indicated on the COC is correct? The date of production of the vehicle or the date of issuing of the COC?

Solutions:

1A	Date of production of vehicle.
1B	Date of issuing of COC.
1C	Other

Decision

Solution	Accepted	Refused
1A	X	
1B		X
1C		X

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

Annex:

Vydáno Osvědčení o registraci vozidla, část II, č. UG467392

ŠKODA
EC CERTIFICATE OF CONFORMITY
Complete vehicle(s).

The undersigned (by: Milan Urban, MBA, Head Type Approval Team) hereby certifies that the vehicle:

E1 Make:	SKODA
E2 Type:	RS
Variant:	AMCROX
Version:	SRMSRHS21040TDSPOAK
E3 Commercial name:	RAPID
E4 Vehicle category:	M1
E5 Designer name and address of manufacturer:	SKODA AUTO a.s., Tr. Václava Klementa 166 293 00 Mladá Boleslav CZ
E6 Location and method of attachment of the statutory plate:	on the left opt. right B - pillar, painted
Location of the vehicle identification number:	right hand side of engine compartment
E7 Vehicle identification number:	TTAAUWHX P123512
Options in all respects to the type described in approval (since 2014-12-15, not applicable)	e11*2007/46*0258*10

can be permanently registered in Member States having single road traffic and using made valid for the applicant

Made valid: **18.09.2015**
by Milan Urban, MBA
Head Type Approval Team

Original

18.09.2015

The meeting agreed with solution B, but no COC will be granted if the directive is no longer valid



RDW



Lithuania

6.22 78/2009 Pedestrian Protection

Issue

Vehicles could be permitted to sale or to entry into service only of such vehicles are satisfying the requirements of the Annex IV of Directive 2007/46/EC.

Legislation:

Regulation (EC) No. 78/2009

<...>

With effect from 24 August 2015, national authorities shall, on grounds relating to pedestrian protection, consider the certificates of conformity to be no longer valid for the purposes of Article 26 of Directive 2007/46/EC, and shall prohibit the registration, sale and entry into service of new category N1 vehicles which do not comply with the technical provisions set out in Section 4 of Annex I to this Regulation.

<...>

Question No. 1:

a) Should the WVTA for category N1 contain the type approval certificate of a type of a vehicle with regard to it being fitted with a frontal protection system?

Possibilities of solution

Comments

A	Yes	Certificate number should be mentioned in the Part III of the I.D.
B	No	As alternative, reference to point No. 9B should be accepted.
C	Other	

Type approving authority "e" 36

Selection of solution	accepted	refused
A	X	
B		X
C		

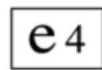
Other opinion / comment:

Part III of the Annex of the Commission Regulation (EC) No 631/2009 sets addition requirements ant test methods, which are not foreseen according to UN ECE Regulation No. 13.

Both A and B are possible. **NL will do a text suggestion in the minutes**



RDW



58.	Pedestrian protection	e4*78/2009*459/2011*XXXX*YY	A??????/all	yes
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Or

58.	Pedestrian protection	for BAS, see item 9B	A??????/all	yes
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RDW



Germany 4

7.1 134/2014 Replacement silencers

1. Reference:

Regulation (EU) No. 134/2014, Annex IX, Appendix 2, subparagraph 3.5.3.1.

3.5.3.1. The replacement silencer shall be such as to ensure that the motorcycle's performance is comparable with that achieved with the original silencer or component thereof.

2. Issue:

How shall type approvals be granted for replacement silencer of vehicles, which were approved according to Directive 2002/24/EC or Regulation (EU) No. 168/2013?

3. Interpretation (KBA)

You can find the interpretation of the KBA regarding this issue in the appendix to this query. The interpretation of the KBA ensued in consultation with the Federal Ministry of Transport and Digital Infrastructure in Germany and the European Commission.

Questions:

Is our interpretation of the Regulation (EU) No. 134/2014 also congruent with the interpretation of the other Member States?

Possibilities of solution

A	Yes
B	No

Type approving authority "e" 1

Selection of solution		accepted	refused
	A	X	
	B		X

The meeting agreed with solution A



RDW



7.3 appendix

Approval of replacement silencer (RS) for motorcycles of the category L_{3e}

	desired approval for replacement silencer	vehicle approval	The noise emission measurement method from the vehicle approval	The noise emission measurement method for replacement silencer	marking (exemplary) for replacement silencer	Comment
1	Directive 97/24/EC Chapter 9	Directive 2002/24/EC	Directive 97/24/EC Chapter 9 equivalent to UN-R No. 41.03	Directive 97/24/EC Chapter 9 equivalent to UN-R No. 41.03	e_2 6789 (S) (9) or e_2 6789 (9) or e_2 6789 (S)	<p><u>Approval for RS till 31.12.2015</u> <u>Extensions unlimited possible</u></p> <p><u>Marking:</u> Directive 97/24/EC Chapter 9</p> <p><u>Evaluation criteria:</u> 1. $\leq +3$ above TA (S) 2. $\leq +1$ above R (M)</p>
2	Directive 97/24/EC Chapter 9	Directive 2002/24/EC	UN-R No. 41.04 (ASEP)	UN-R No. 41.04 (ASEP)	e_2 6789 (S) (9) or e_2 6789 (9) or e_2 6789 (S)	<p><u>Approval RS till 31.12.2015</u> <u>Extensions unlimited possible</u></p> <p><u>Marking:</u> Directive 97/24/EC chap. 9</p> <p><u>Evaluation criteria:</u> 1. $\leq +1$ above R (M)</p>
3	Directive 97/24/EC Chapter 9	Regulation (EU) No. 168/2013	Regulation (EU) No. 134/2014 equivalent to UN-R No. 41.04 (ASEP)	<u>not applicable</u>	<u>not applicable</u>	<p><u>Approval according to Directive 97/24/EC Chapter 9 not possible:</u> <u>Type approval for systems or components just according to the Regulation (EU) No. 168/2013</u></p>
4	Regulation (EU) No. 134/2014	Directive 2002/24/EC	Directive 97/24/EC Chapter 9 equivalent to UN-R No. 41.03	Directive 97/24/EC Chapter 9 equivalent to UN-R No. 41.03	e_{21} 00024 H or e_{21} 00456 G	<p><u>Approval for RS and extensions unlimited possible.</u></p> <p><u>Marking:</u> Regulation (EU) No. 901/2014 Article 6, Annex V, Appendix 2, Figure 1 or 2</p> <p><u>Evaluation criteria:</u> 1. $\leq +1$ above R (M)</p>



RDW



5	Regulation (EU) No. 134/2014	Directive 2002/24/EC	UN-R No. 41.04 (ASEP)	UN-R No. 41.04 (ASEP)	 00024 H	or	 00456 G	<p><u>Approval for RS and extensions unlimited possible.</u></p> <p><u>Marking:</u> Regulation (EU) No. 901/2014 Article 6, Annex V, Appendix 2, Figure 1 or 2</p> <p><u>Evaluation criteria:</u> 1. $\leq +3$ above TA (S) 2. $\leq +1$ above R (M)</p>
6	Regulation (EU) No. 134/2014	Regulation (EU) No. 168/2013	Regulation (EU) No. 134/2014 equivalent to UN-R No. 41.04 (ASEP)	Regulation (EU) No. 134/2014 equivalent to UN-R41.04 (ASEP)	 00024 H	or	 00456 G	<p><u>Approval for RS and extensions unlimited possible.</u></p> <p><u>Marking:</u> Regulation (EU) No. 901/2014 Article 6, Annex V, Appendix 2, Figure 1 or 2</p> <p><u>Evaluation criteria:</u> 1. $\leq +3$ above TA (S) 2. $\leq +1$ above R (M)</p>

TA: Sound level - type approval
 R: Sound level - first registration
 M: Test for vehicle in motion
 S: Test for stationary vehicle



RDW



France 3

7.2 44/2014 Calculation of pay-mass

Subject : Calculation of the pay-mass for category L_cat vehicles.

References: 168/2013 (article 5) and 44/2014 (article 2 & annexe XI)

According to the article 5 of 168/2013, the mass in running order of an L-category vehicle shall be determined by measuring the mass of the unladen vehicle ready for normal use and shall include the mass of liquids, standard equipment and fuel (90 % of their capacities). The driver and passenger are excluded from the mass in running.

The items 29 and 34 of article 2 of the 44/2014, define the actual mass and the pay-mass.

- Actual mass in relation to a vehicle means the mass in running order as referred to in Article 5 of Regulation (EU) No 168/2013, plus the mass of the driver (75 kg), plus the mass of the alternative propellant storage if applicable and plus the mass of optional equipment fitted to an individual vehicle;

- Pay mass means the difference between the technically permissible maximum laden mass and the actual mass of the vehicle;

Issue:

For EC-type approval purpose, a manufacturer shall provide to the approval authority, for each version within a vehicle type, irrespective of the state of completion of the vehicle, details of the masses. It seems that there are different practices among UE for the calculation of pay-mass.

We observe that in some cases the mass of optional equipment is not subtracted from the technically permissible maximum laden mass in order to define the pays mass.

Interpretation

Pay-mass = technically permissible maximum laden mass – Actual mass

Pay-mass= technically permissible maximum laden mass – Mass in Running Order - Mass of the driver – Mass of the alternative propellant storage if applicable - **Mass of optional equipment**

The French interpretation is that the mass of options should be subtracted from the technically permissible maximum laden mass.

Question

Is our interpretation of the Regulation (EU) No. 44/2014 also congruent with the interpretation of the other Member States?

Possibilities of solution

A	Yes
B	No

The meeting agreed with solution A



RDW



7.3 168/2013 manufacturers representative

France 4

SUBJECT: Manufacturer's representative

REFERENCES: Regulation 168/2013, articles 3 and 9

Article 3

Definitions

48) "manufacturer's representative" means any natural or legal person established in the Union who is duly appointed by the manufacturer to represent the manufacturer before the approval authority or the market surveillance authority and to act on the manufacturer's behalf in matters covered by this Regulation;

Article 9

Obligations of manufacturers

4. For the purposes of approval of vehicles, systems, components or separate technical units covered by this Regulation, manufacturers established outside the Union shall appoint a single representative established within the Union to represent them before the approval authority.

5. Manufacturers established outside the Union shall furthermore appoint a single representative established within the Union for the purposes of market surveillance, which may be the representative referred to in paragraph 4 or an additional representative.

ISSUE :

It is clear that manufacturers established outside the Union shall appoint a single representative established within the Union for the purposes of market surveillance, and type approval activities.

What about a manufacturer established inside the Union ?

CNRV was questioned if a french company (importer) could be the representative of the manufacturer from UK.

This case seems to be not desirable considering the link mandatory/manufacturer, but the Regulation 168/2013 does not prevent it.

QUESTION 1:

In the context of regulation 168/2013, can a manufacturer established in the EU appoint a EU representative ?

SUGGESTED ANSWERS:

Type approving authority "e"	2
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Selection of solution		accepted	refused
A manufacturer established in the EU can appoint a EU representative	A		
A manufacturer established in the EU can't appoint a EU representative	B		

The meeting agreed with solution A



RDW



Netherlands

7.4 168/2013 35 kW conversions

Directive or Regulation number:
EU 168/2013
Subject:
after-market 35 kW modification kits

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

Question:
After market suppliers like Alpha Technik GmbH & Co. KG offer Micro Controlled Restrictions to convert motorcycles approved as L3e-A3 under EU Regulation 168/2013 to 35 kW.
Question:
Would you register vehicles converted by a party other than those controlled by the manufacturer (and for which a Type approval as L3e-A2 is available) ?
Solutions:
A no; only vehicles that are offered as L3e-A2 by the manufacturer can be registered as such
B yes; when a Technical Service has determined the engine power, emissions, noise etc. they can be registered as having max. 35 kW.

Decision:		
<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
A	X	
B		X

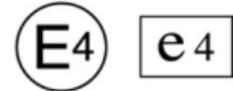
Authority:
Type approval Authority e/E 4

Remarks:
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The meeting agreed with solution B, modification should be visible on the vehicle's documents. Member States can refuse a modified vehicle.



RDW



7.5 168/2013 and 44/2014, 97/24 anti-tampering

Sweden 2

SUBJECT: Anti-tampering measures for two-wheel mopeds and motorcycles.

DIRECTIVE: 2002/24/EC, 97/24/EC, Regulation (EU) No. 168/2013, Regulation (EU) No. 44/2014

RELEVANT SECTION: 97/24/EC, CHAPTER 7, (EU) 44/2014, ANNEX II

QUESTION/DISCUSSION:

In Sweden we have problems with mopeds where the motors have been modified to make the moped go faster than 45 km/h with resulting deterioration in road safety. Do you also have this kind of problem in your country? Can a tightening of requirements be a good way to obstruct and minimize unauthorized changes or do you have other good solutions to the problem?

We would like to know how other authorities handle this problem.

Question was skipped



7.6 168/2013 Test result sheets

Spain 1

Directive or Regulation number
Regulation (EU) No. 168/2013 and Commission Implementing Regulation (EU) No. 901/2014
Subject:
Attachment of Test Results Sheet into EU type approval certificate

Text:
Article 9 of Regulation (EU) No 901/2014: Template for Test Results Sheet: <i>"...Approval authorities shall issue the test results sheet referred to in Article 30(3) of Regulation (EU) No 168/2013 on the basis of the template set out in Annex VIII to this Regulation..."</i>
Article 30(3a) of Regulation (EU) No 168/2013 : <i>"... 3. In respect of each type of vehicle, the approval authority shall: (a) complete all the relevant sections of the EU type-approval certificate, including the test results sheet appended thereto;..."</i>
Article 5 item1 of Directive 2002/24/EC it states: <i>"...1. The competent authority in a Member State shall complete the type-approval form contained in Annex III for all types of vehicles in respect of which it conducts type-approval, and in addition shall enter the test results under the relevant headings on the form attached to the vehicle approval form, the model for which is given in Annex VII..."</i>
Concern:
With the purpose of all Approval Authorities adopt the same criteria's when issuing approval certificates, it is needed to clarify if the Test Results Sheet should or not be included in the EU type approval certificate as indicated above. Several approvals have already been issued and some of them do not include this Test Results Sheet.

Question:			
Following the same analogy with Annex VII stated on item 1 of Article 5 of Directive 2002/24/EC, has the Test Results Sheet mentioned on Article 9 of Regulation (EU) No 901/2014 to be reported on the approval certificates and issued by Approval Authorities?			
Solution:		Accepted	Refused
A	YES, it shall be reported and issued by the Approval authorities	X	
B	NO, it can be considered as an attachment of EU type approval certificate but not necessarily issued by the approval authority, thus included on the Technical Services report only		X
Authority:			
Type-approval Authority e/E 9			

The meeting agreed with solution A, format information document should be modified



RDW



7.7 168/2013 Label with manufacturer's address

Spain 2

Directive or Regulation number
Regulation (EU) No. 168/2013
Subject:
Manufacturer's EU address marking affixed on each vehicle

Text:
Item 8 of Article 9 of Regulation (EU) No 168/2013: Obligations of manufacturers <i>"...In addition to the statutory marking and type-approval marks fixed to their vehicles, components or separate technical units in accordance with Article 39, manufacturers shall indicate their name, registered trade name or registered trade mark and the address in the Union at which they can be contacted on their vehicles, components or separate technical units made available on the market or, where that is not possible, on the packaging or in a document accompanying the component or separate technical unit.</i>
Concern:
Clarification to align all vehicle manufacturers and Technical Services regarding the need to affix the manufacturer's name, registered trade name or registered trade mark and the address in the Union at which they can be contacted on their vehicles.

Question:			
Is it required to affix to the vehicle an additional marking with manufacturer name, registered trade name or registered trade mark and the contact address in the Union, even if this marking label is not defined on R(EU) 901/2014 nor requested on any item of the information document to be provided by the manufacturer?			
Solution:		Accepted	Refused
A	YES, it is mandatory following item 8 of article 9 of Regulation (EU)168/2013 to include the EU contact address	X	
B	NO, it will be manufacturers decision to provide it or not		X
Authority:			
Type-approval Authority e/E 9			

The meeting agreed with solution A



RDW



7.8 168/2013 – 901/2014 Statutory plate

Spain 3

Directive or Regulation number
Regulation (EU) No. 168/2013 and Commission Implementing Regulation (EU) No. 901/2014
Subject:
Manufacturer statutory plate

Text:
<p>Article 39 of Regulation (EU) No 168/2013: Statutory plate with the appropriate marking of vehicles and type-approval mark of components or separate technical units</p> <p><i>"...1. The manufacturer of a vehicle shall affix to each vehicle manufactured in conformity with the approved type a statutory plate with the appropriate marking required by the relevant implementing act adopted pursuant to paragraph 3"</i></p> <p>Item 2 of Annex V to Regulation (EU) No 901/2014: Statutory plate</p> <p><i>"... 2.1. statutory plate, using the model set out in Appendix 1 shall be firmly attached in a conspicuous and readily accessible position to part of the vehicle which is unlikely to be replaced during normal use, regular maintenance or repair (e.g. due to accident damage).</i></p> <p><i>2.1.1. The information on the plate shall be clearly legible, indelible and shall contain the following information in the order given below and on the same line, if possible"</i></p> <p>Collins English Dictionary: Plate definition.</p> <p><i>"...a plate is a flat piece of metal, especially on machinery or a building" ... " a plate is a sheet of metal..."</i></p>
Concern:
<p>It is not clearly stated on Regulation (EU) No 168/2013 neither on Regulation (EU) 901/2014, the definition of construction material of manufacturer statutory plate. It is needed to clarify construction requirements of plate material since it is not clear the acceptance of a sticker or destructive labels as manufacturer statutory plates.</p>

Question:			
Is it allowed the use of destructive labels/stickers as manufacturer statutory plate defined on Item 2 of Annex V to Regulation (EU) No 901/2014?			
Solution:	Accepted	Refused	
A	YES, destructive labels/stickers as a manufacturer statutory plate can be accepted	X	
B	NO, destructive labels/stickers as a manufacturer statutory plate cannot be accepted. It shall be a metal sheet.		X
Authority:			
Type-approval Authority e/E 9			

The meeting agreed with solution A



RDW



UK 1

7.9 134/2014 Non-original replacement silencers

Subject: L Category non-original replacement exhausts silencers

Legislation

Annex IX, Appendix 2,

3.5.3. Testing of motorcycle performance

3.5.3.1. The replacement silencer shall be such as to ensure that the motorcycle's performance is comparable with that achieved with the original silencer or component thereof.

3.5.3.2. The replacement silencer shall be compared with an originally-fitted silencer, also in new condition, fitted to the motorcycle referred to in point 3.2.3.3.

3.5.3.3. This test is carried out by measuring the engine power curve. The net maximum power and the top speed measurements with the replacement silencer shall not deviate by more than ± 5 % from those taken under the same conditions with the original equipment silencer.

3.5.4. Additional provisions relating to silencers as separate technical units containing fibrous material

Fibrous material may not be used in the construction of such silencers unless the requirements set out in point 2.3.1 are met.

3.5.5. Evaluation of the pollutant emissions of vehicles equipped with a replacement silencer system.

The vehicle referred to in point 3.2.3.3, equipped with a silencer of the type for which approval is requested, shall undergo a type I, II and V test under the conditions described in the corresponding Annexes II, III and VI according to the type-approval of the vehicle.

The requirements regarding emissions shall be deemed to be fulfilled if the results are within the limit values according to the type-approval of the vehicle.



Discussion

The VCA feel that it is unnecessarily onerous to require emissions testing for replacement exhaust silencers that do not alter the power curve, net power and top speed by more than $\pm 5\%$ and has no impact to the catalyst, sensors or ECU.

However it is clear from the regulation that the tests should be carried out regardless.

The VCA feel that the tests seem to be excessive for comparably low volumes and costs of the product and want to confirm other member states agree with our view that engineering judgement can be used to decide on the need to test emissions to make the process less arduous?

Question 1

What testing shall a replacement L category exhaust silencer undergo?

Suggested Answers:

Type Approval Authority "e"	11	
	Accepted	Refused
A. The wording of the regulation should be followed and the exhaust system or components shall always undergo a type I, II and V test.		
B. If the deviation of the power curve, net power and top speed does not alter by more than $\pm 5\%$ it can be assumed the emissions will have not altered by a sufficient amount to be of any concern so type I, II and V tests can be ignored.		
C. Other		

No decision was taken. Legislation should be changed. NL will take this to UN/ECE.



RDW



Germany 8

8.1 167/2013 Definition “R” and “S”

In article 3 of the Regulation (EU) No 167/2013 the definitions for “trailer” (R) and “interchangeable towed equipment” (S) are listed under number 9 and 10.:

(9) “trailer” means any agricultural or forestry vehicle intended mainly to be towed by a tractor and intended mainly to carry loads or to process materials and where the ratio of the technically permissible maximum laden mass to the unladen mass of that vehicle is equal to or greater than 3,0;

(10) “interchangeable towed equipment” means any vehicle used in agriculture or forestry which is designed to be towed by a tractor, changes or adds to its functions, permanently incorporates an implement or is designed to process materials, which may include a load platform designed and constructed to receive any tools and appliances needed for those purposes and to store temporarily any materials produced or needed during work and where the ratio of the technically permissible maximum laden mass to the unladen mass of that vehicle is less than 3,0; ‘

2. Issue

The only concrete differentiation between vehicles of categories R and S is the ratio of the technically permissible maximum laden mass to the unladen mass. There are several vehicles which have ratio close to 3,0. Due to this a trailer with a ratio of less than 3,0 may be also classified as towed equipment, if there is any device on the trailer which may be accepted as a change or adding to the function of the tractor.

But in the definition No. 9 there is still the first condition for the classification as an trailer to carry mainly loads.

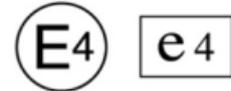
Question:

How should a “changing or adding of functions to the tractor” be rated for towed vehicles.

How should the following examples of vehicle be classified?



RDW



Example 1 :



Example 2 :



Possibilities of solution

A	The vehicle is mainly intended to carry loads => category "R"
B	The vehicle is able to carry loads, but not mainly. In connection with the power take-off those vehicle change or add the function of the tractor => category "S"

Type approving authority "e" 1

Selection of solution		accepted	refused
	A	X	
	B		X

The meeting agreed with solution A



8.2 167/2013 – 168/2013 Article 8

1. Reference:

Regulation (EU) No 167/2013 Article 8:

Obligation of manufacturers

4. For the purposes of approval of vehicles, systems, components or separate technical units covered by this Regulation, manufacturers established outside the Union shall appoint a single representative established within the Union to represent them before the approval authority.

5. Manufacturers established outside the Union shall furthermore appoint a single representative established within the Union for the purposes of market surveillance, which may be the representative referred to in paragraph 4 or an additional representative.

2. Issue:

In the regulations (EU) No 167/2013 and 168/2013 a representative is required for manufacturer established outside the Union.

Manufacturer's representative means any natural or legal person established in the Union who is appointed by the manufacturer to represent at the approval authority or at the market surveillance authority. Regarding the type approval procedure the number of representatives is not limited while for the representation for market surveillance only one representative in the Union can be appointed.

To control the requirement to appoint a representative will be difficult, if type approval authorities and market surveillance authority are separate authorities.

With EU legal acts (Regulations (EU) No 167/2013, 168/2013 and the expected analog update of directive 2007/46/EC) the application of UN ECE are mandatory required. Therefore also in the field of UN ECE legal acts representatives need to be appointed by the manufacturers established outside the Union. This would be a new procedure in UN ECE. But a change is not required if the approved products are not purposive for the marketing within the European Economic Area.

Question:

1: Do you require the appointment of a representative for market surveillance for the application of EU type approvals of a manufacturer established outside the Union?

2: Is the appointment of representatives (for the type approval process and market surveillance) valid for type approvals based on UN ECE, which are mandatory required?

Possibilities of solution

Comments

	Possibilities of solution	Comments
1	A Yes	
	B No	
2	A Yes	
	B No	



Type approving authority "e" 1

Selection of solution	1	accepted	refused
A		X	
B			X

Selection of solution	2	accepted	refused
A			X
B		X	

The meeting agreed with solution 1A and 2B



8.3 167/2013 Classification of category

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:
 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;

Some manufacturer of category vehicles (for example TATRA; type of bodywork BD – road tractor, BA – Lorry – figure 1 and figure 2) after performing of some modifications (addition of ROPS, coupling devices, speed limiter, front fixing plate, special warning light, additional light, protection of the running light – figure 3 to figure 11) would like to categorize these vehicles as T category vehicle and to apply for an EC-type approval according to EU Regulation 167/2013. The purpose of those modifications and re-categorization of the vehicles from N₃, N₃G category to T category is especially an effort to avoid the taxes and road tolls.

In our opinion, the upper mentioned modifications of vehicles are not sufficient for categorization them as T category vehicles and the vehicles still belong to N₃, N₃G category despite of the modifications.

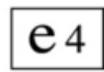
Question:
1. It is possible after some modifications to change the vehicle category from N ₃ , N ₃ G to T?
2. It is possible for such T category vehicles to grant an EC-type approval according to EU Regulation 167/2013?

Solutions:
1A Yes, it is possible.
1B No, it isn't.
1C Yes, it is possible but only for national TA.
Solutions:
2A Yes
2B No
2C No, only national TA.

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



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2A		X
2B	X	
2C		X

Authority:	
Type approval Authority e/E	27

Annex:



Figure 1



Figure 2



RDW

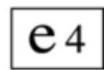


Figure 3 - ROPS



Figure 4 - coupling devices



RDW

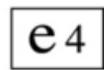


Figure 5 - front fixing plate, protection of the running light



Figure 6 - special warning light



RDW

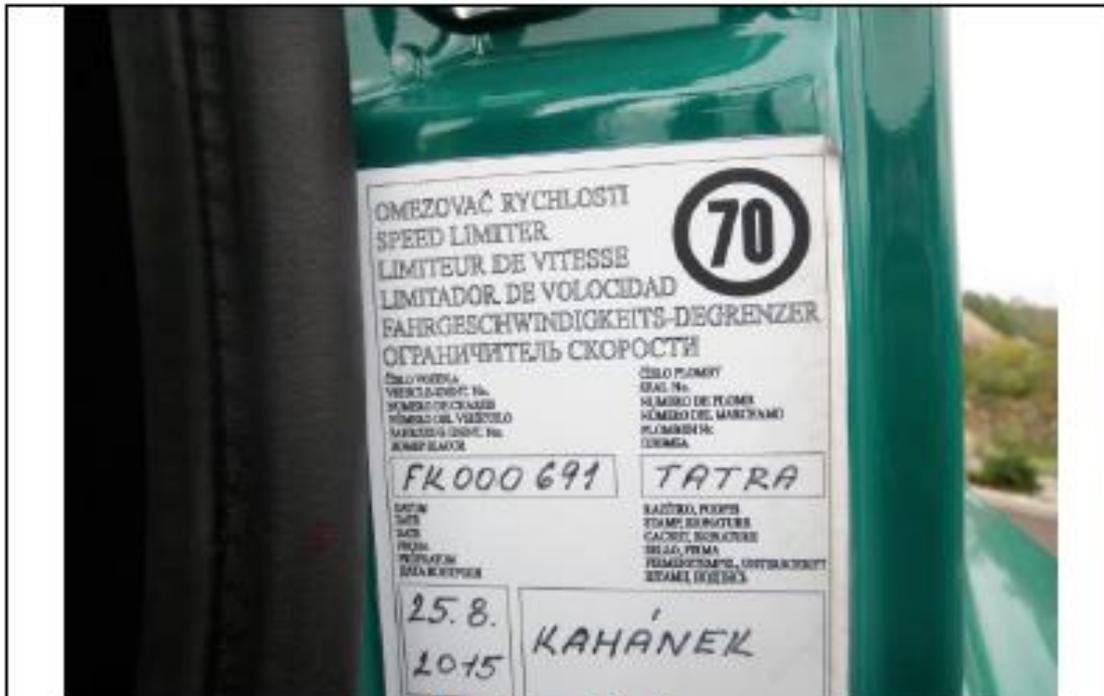
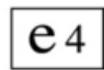


Figure 7 - speed limiter



Figure 8 - additional light



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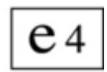


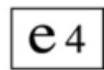
Figure 9



Figure 10



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The meeting agreed with solution B (Q1) vehicle should meet all the requirements for cat. T and A (Q2) vehicle should meet all the WVTA requirements for cat. T and is only possible for new vehicles.



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9. Miscellaneous

A lot of discussion about punt 6.1, tot was decided to bring this to TAAEG once again.

10. Next TAAM

No volunteers yet, to be decided.

11. Any other Business

None



RDW



12. List of attendees

	First name	Last name	Organization	Country
ms.	Milena	Atanasova	Road Transport Administration	Bulgaria
mr.	Gergő	Ávár	National Transport Authority	Hungary
mr.	Maarten	Balk	RDW	Netherlands
mr.	Chris	Bisschops	Human Environment and Transport Inspectorate	Netherlands
mr.	Ignacio	Blanco	INTA	Spain
mr.	Valdis	Blekte	Road Traffic Safety Directorate (CSDD)	Latvia
mr.	Rory	Brennan	NSAI	Ireland
mr.	Virginijus	Čiškauskas	State Road Transport Inspectorate	Lithuania
mr.	Björn	Englund	Swedish Transport Agency	Sweden
mr.	Javier	Fadrique	LCOE	Spain
mrs.	Christine	Force	French Authority	France
mr.	Stefan	Gajdos	Ministry of Transport	Slovakia
mrs.	Noémi	Gáspár-Zsován	National Transport Authority	Hungary
mr.	Boris	Gorup	State Office for Metrology	Croatia
mr.	Kristinn	Gretarsson	Icelandic Transport Authority	Iceland
mr.	Olafur Arnar	Gunnarsson	Icelandic Transport Authority	Iceland
mr.	Patrik	Hammarbäck	Swedish Transport Agency	Sweden
mr.	Kieran	Hogan	NSAI	Ireland
mr.	Franz	Höllner	Austrian TAA	Austria
mr.	Corentin	Jaloux	French Authority	France
mr.	Peter	Jennerjahn	KBA	Germany
mr.	Lubomír	Kincl	Ministry of Transport	Czech Republic
mr.	Rob	Knipping	RDW	Netherlands
mr.	Goran	Košir	Centar za vozila Hrvatske	Croatia
mr.	Jerzy W.	Kownacki	Motor Transport Institute (ITS)	Poland
mr.	Intars	Krots	Road Traffic Safety Directorate (CSDD)	Latvia
mr.	Romain	Lamberty	SNCH	Luxembourg
mr.	Hans	Lammers	RDW	Netherlands
mr.	Laurent	Linden	SNCH	Luxembourg
mr.	Pavol	Líška	ZV-TEST s.r.o., Zvolen, Slovakia	Slovakia
mr.	Artur	Marciniszyn	Transportation Technical Supervision	Poland
mr.	Leif Erik	Meyer-Truelsen	Kraftfahrt-Bundesamt	Germany
ms.	Lubomir	Moravcik	Ministry of Transport	Slovakia
mr.	Sven	Paeslack	KBA	Germany
mr.	Justas	Petrauskas	State Road Transport Inspectorate	Lithuania
mr.	Mike	Protheroe	VCA	United Kingdom
mr.	Douglas	Roberts	Vehicle Certification Agency	United Kingdom
mr.	Luca	Rocco	Ministry of Infrastructure and Transport	Italy
mr.	Lluis	Sans	IDIADA Automotive Technology	Spain
mrs.	Guillaume	Séverine	UTAC	France
mr.	Marko	Sinerkari	Finnish Transport Safety Agency Trafi	Finland
mr.	Peter	Striekwold	RDW	Netherlands
mr.	Harri	Tenhunen	Finnish Transport Safety Agency Trafi	Finland
mr.	Martin	Tichý	Ministry of Transport	Czech Republic
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