International Whole Vehicle Type Approval

A Way Forward

Dr. Peter Schramm, Certification and Regulatory Affairs Safety
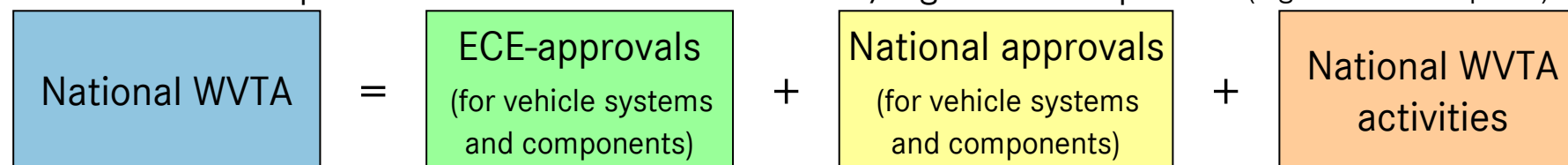
WVTA in Contracting Parties Today

In order to type approve a vehicle in any given country, the following regulations are used:

- **ECE-regulations**
  - Mandatory (or accepted as alternative to national requirements) for WVTA within the corresponding contracting party (CP)
  - Compliance is documented in terms of a type approval (of a system, component, etc.)
  - Mutual recognition of approvals betweeen different contracting parties applying the same ECE regulation (based on 58-agreement)
  - Set of required regulations differs from one CP to another
  - ECE-regulations with different stringency levels (e.g. R-83) require special attention
- **National/regional regulations**
  - Mandatory within the corresponding country/region
  - No mutual recognition
  - Some requirements can be proven in terms of separate type approvals of vehicle systems, components, etc. (e.g. EC directives and regulations)
  - Other requirements are verified within national/regional WVTA-process (e.g. TRIAS test reports)

| National WVTA	=	ECE-approvals (for vehicle systems and components)	+	National approvals (for vehicle systems and components)	+	National WVTA activities

Ultimate Goal for I-WVTA
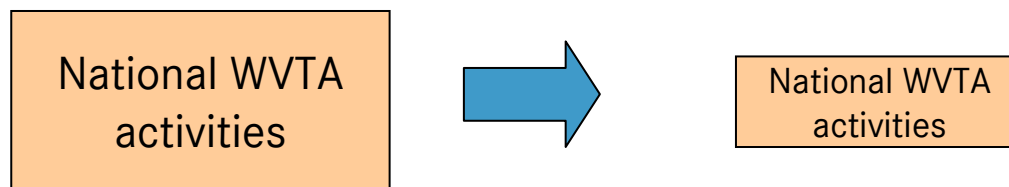
Complete mutual recognition of whole vehicle approval
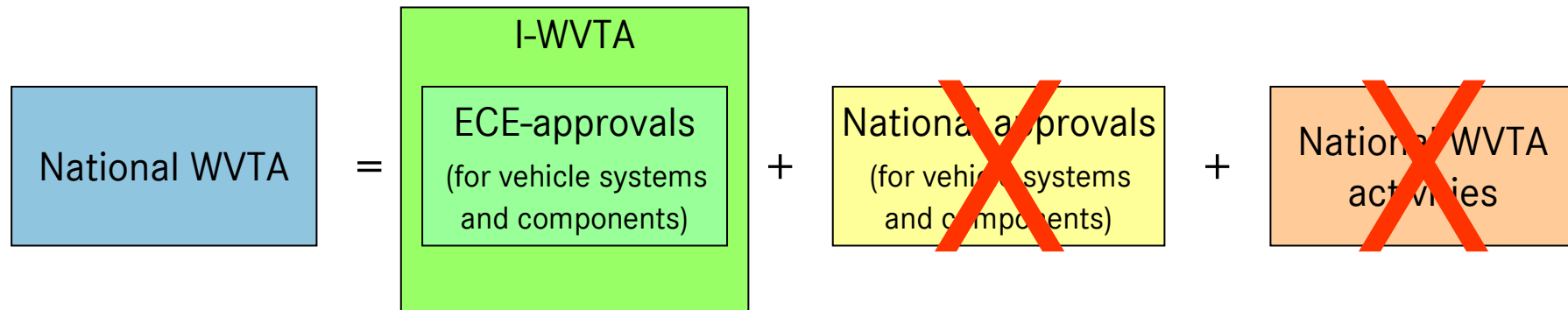
Transitional Process for I-WVTA
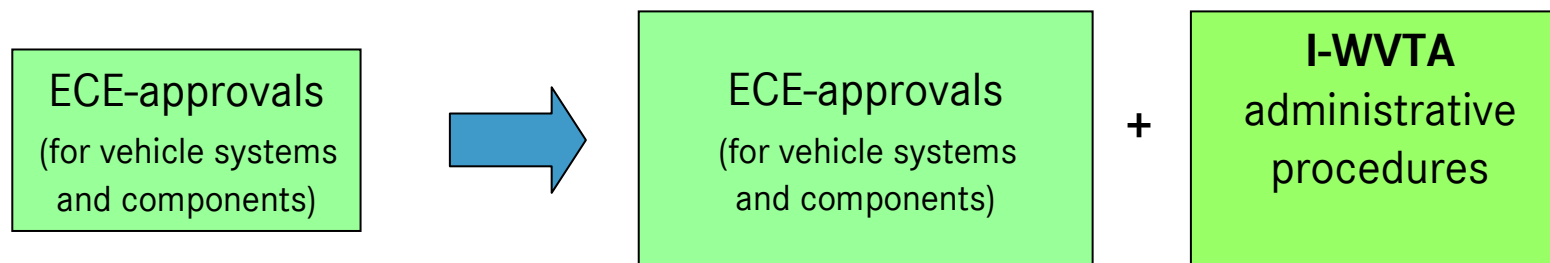
Enhance mutual recognition of approvals

→Minimize (and eventually eliminate) necessary national approvals

National approvals (for vehicle systems andcomponents) → National approvals (for vehicle syst.and comp.)
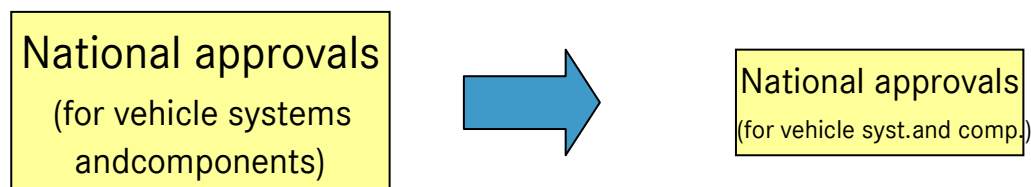
→Minimize activities to obtain national WVTA / registration

National WVTA activities → National WVTA activities

→ Achieve this via wider acceptance of ECE-approvals + introduction of I-WVTA

ECE-approvals (for vehicle systems and components) → ECE-approvals (for vehicle systems and components) + **I-WVTA** administrative procedures
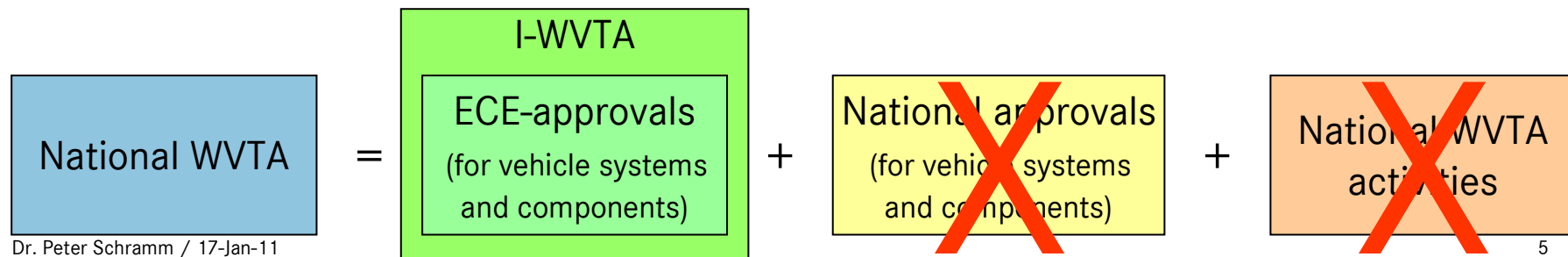
Step 1: I-WVTA is a shell over a set of separate ECE-approvals, which is agreed as common ground by all CPs applying I-WVTA

I-WVTA

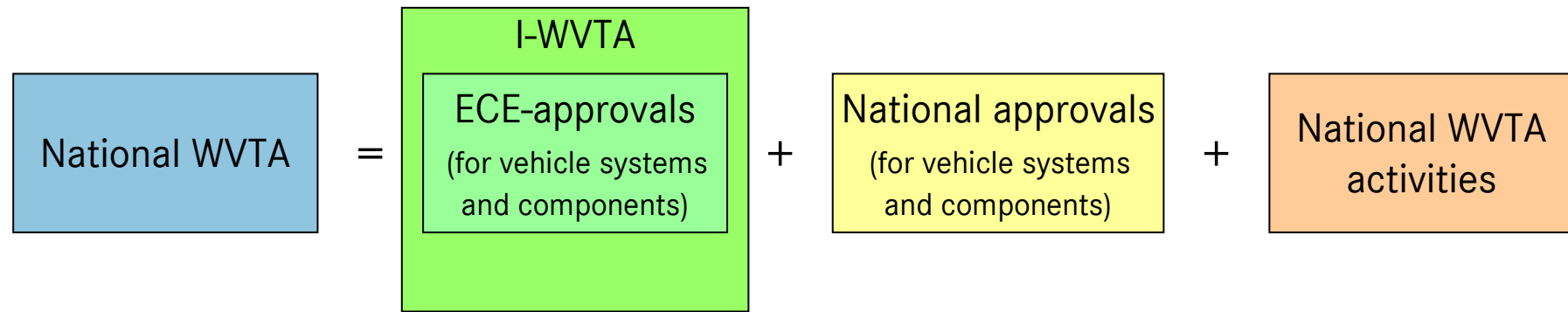National WVTA = ECE-approvals (for vehicle systems and components) + National approvals (for vehicle systems and components) + National WVTA activities
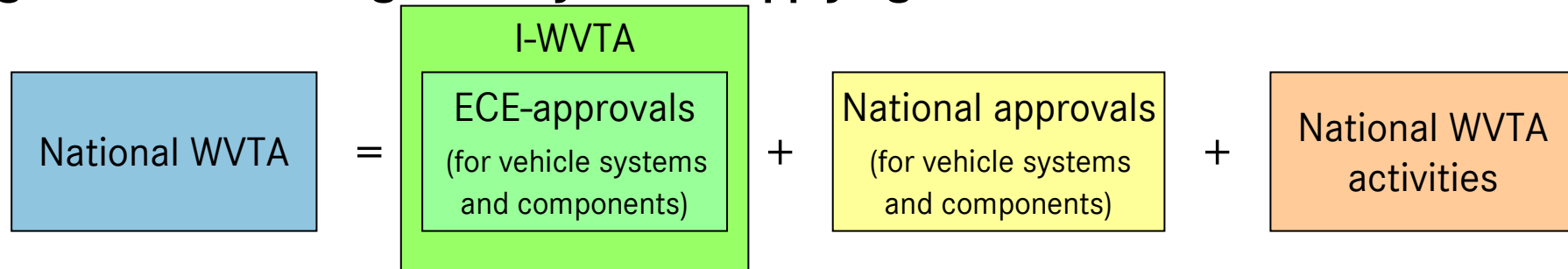
Step 2: I-WVTA is a shell of all separate type approvals (both ECE and national)
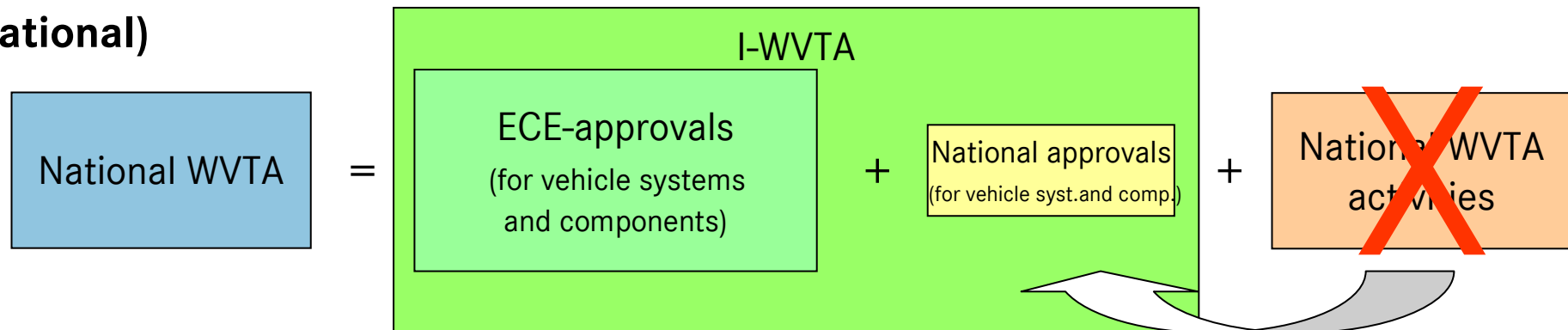
I-WVTA

National WVTA = ECE-approvals (for vehicle systems and components) + National approvals (for vehicle syst.and comp.) + ~~National WVTA activities~~

Step3: Complete mutual recognition of whole vehicle approval

I-WVTA

National WVTA = ECE-approvals (for vehicle systems and components) + ~~National approvals (for vehicle systems and components)~~ + ~~National WVTA activities~~

Step 1: I-WVTA contains only ECE approvals

National WVTA = I-WVTA [ECE-approvals (for vehicle systems and components)] + National approvals (for vehicle systems and components) + National WVTA activities
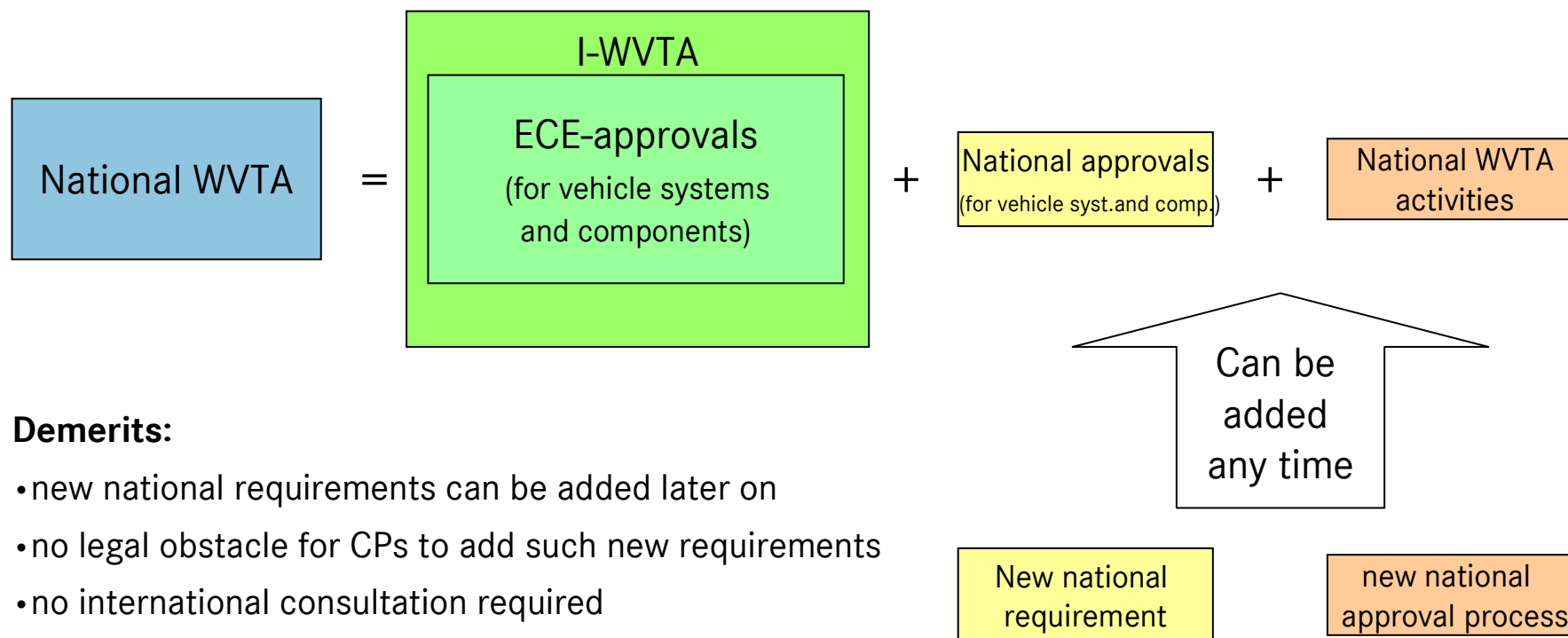
- Pragmatic starting point for I-WVTA: e.g. contents of EC-WVTA

- Common content of I-WVTA (except for ECE-approvals allowing for different stringency levels)

- Easily compatible with 58-agreement in terms of ECE R-0 concept

- However, I-WVTA is actually a „partial vehicle type approval"
    → subsequent national activities for WVTA/registration necessary

- Challenge: transparency and containment of these subsequent activities (see next slide)

Step 1: I-WVTA contains only ECE approvals
Evolution over time

Desired development:

- national requirements get less over time (are eliminated or become harmonized)

National WVTA = I-WVTA [ECE-approvals (for vehicle systems and components)] + National approvals (for vehicle syst. and comp.) + National WVTA activities

Demerits:

- new national requirements can be added later on
- no legal obstacle for CPs to add such new requirements
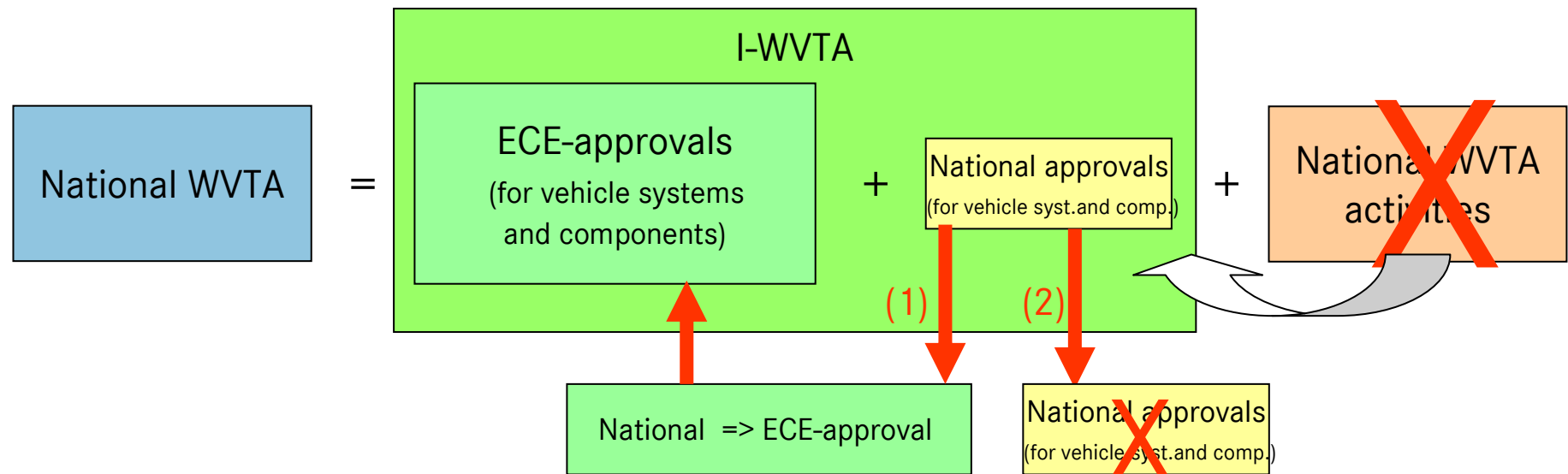- no international consultation required

Can be added any time

New national requirement

new national approval process

- Safeguard: implement international notification procedure (see later)

Step 2: I-WVTA contains ECE and national approvals
Evolution over time

Desired development:

- national requirements get less over time (are eliminated or become harmonized)
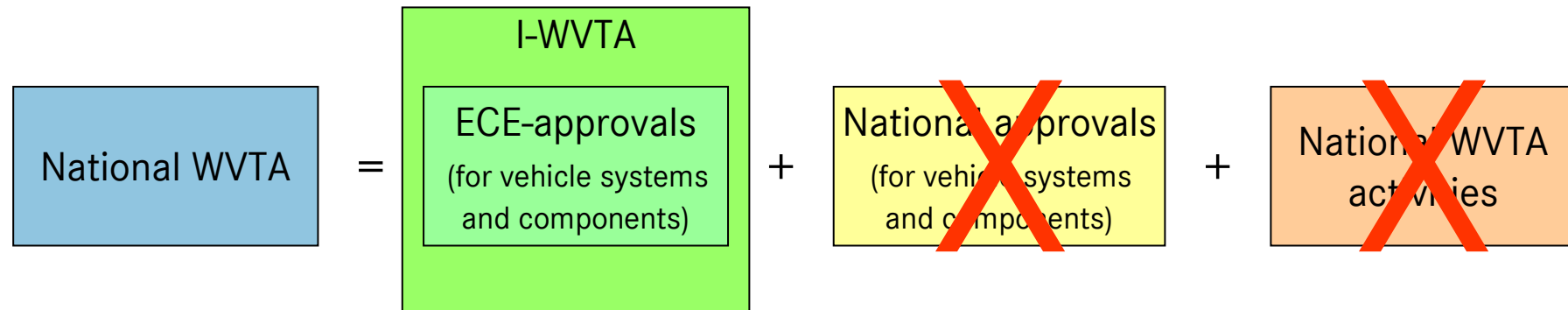- national administrative activities are removed

Demerits:

new national requirements can be added later on

Safeguard: such new requirements would have to be incorporated into ECE R-0

→ no national change without international consultation

Step3 for I-WVTA

Complete mutual recognition of whole vehicle approval

How to go forward?

Step 1: IWVTA contains only ECE approvals

- provides a straightforward approach within the 58-agreement
- but achieves only „partial vehicle type approval" potentially valid but not sufficient in all countries
- seems acceptable to CPs

Step 2: IWVTA contains ECE and national/regional approvals

- achieves „whole vehicle type approval", however has preceding steps on national level („national system approvals")
- but is more complicated and requires changes of national type approval legislation: recast national requirements as „system type approvals"
- would constrain flexibility of CPs with respect to adding national requirements
- seems difficult to convey

Step 3: no national requirements at system level – only registration

Recommendation:

Start with Step 1 before pursuing Steps 2 and 3

As part of Step 1, insert a provision into the 58-agreement which requires CPs to notify new national requirements to WP.29 before implementation