

Remarks of the Netherlands to the table of applicable regulations for IWVTA .

This document gives some remarks on the amended draft table of applicable regulations for IWVTA (see IWVTA-05-03) that has been distributed recently.

1. Emissions

Regulation 15 has been replaced by regulation 83 and I believe that it is not realistic to grant an IWVTA on the basis of regulation 15.

2. LPG and CNG

Item 3 of the table deals with fuel tanks and rear underrun protection. As far as it concerns fuel tanks the ECE-regulations 67 and 110 shall be used. However these 2 regulations cover more safety items than just the fuel tank. They give also provisions for the approval of other components of the whole LPG or CNG system. In item 57 Japan indicates that it would like to apply ECE-regulation 67 entirely (at least that is how I read their input) and not only for the approval of the tanks as the EU seems to do. A decision of the European Commission making many ECE-regulations mandatory for a European Whole Vehicle Type Approval (ECWVTA) covers also ECE-regulations 67 and 110 without mentioning any limitation to the tank. So, I would suggest that:

- Regulations 67 and 110 shall not be indicated under item 3.
- for the EU position the letter A shall be added in item 57 and
- in a new item 76 for “Specific components for CNG” a letter A shall be inserted for the EU.

Item 53, covering “Equipment for LPG vehicles”, has a footnote 4 referring to retrofit parts. But for retrofit of LPG and CNG we have a separate UNECE-regulation No.115. In addition I have some doubts whether provisions for retrofit parts must to be part of an International Whole Vehicle Type Approval.

Item 57 deals with “Fuel system and High pressure gas” and refers to regulations 67 and 100. I think that it is the intention to refer to regulation 110 and not to regulation 100. Furthermore the wording of the subject is too limited as regulation 67 also deals with direct liquid LPG injection.

3. Headlamps (including bulbs)

For item 25, “Headlamps (including bulbs)”, the EU wants to apply the letter A for ECE-regulations 1, 8 and 20. These 3 regulations are incorporated in ECE-regulation 112 and cannot be used anymore for new vehicle type approvals. I assume that at the start of the IWVTA there are not yet existing type approvals and hence all approvals will be new vehicle type approval. Therefor I would suggest deleting these 3 regulations 1, 8 and 20.

Also for item 25 one can see that regulation 5 should be applied for an IWVTA, but as far as I can verify, that regulation 5 is not incorporated in the Commission’s decision to make many ECE-regulations mandatory of ECWVTA. From my GRE-colleague I understood that this regulation 5 is not used in Europe, but it could be considered to keep it in the table as Canada might be interested in it. The position of the EU could be that regulation 5 should be put between square brackets.

4. Tyres

Item 42 will require R30 and R54 for IWVTA, but these regulations don't have installation provisions like the EU has. Maybe a new item 42c could be added for the installation of tyres, including the letter A for the EU.

5. Headlamp cleaners

Item 51, headlamp cleaners, indicates no priority for the EU to apply ECE-regulation 45.

However, these devices are in regulation 48 mandatory in case of gas-discharge lamps. Unless I have to read the table in a different way, I would suggest adding the letter A in row 65 for the EU position in this table.

6. Battery electric vehicles

Item 55 deals with battery electric vehicles. A decision of the Commission to make several UN/ECE-regulations mandatory includes Regulation 100. Therefore I believe that for the EU the letter A should be given.

7. Cornering lamps

Item 56, cornering lamps, gives no priority for the EU to apply ECE-regulation 119. However, these devices are mentioned in regulation 48. Unless I have to read the table in a different way, I would suggest adding the letter A for the EU position in this table.

8. General remark

Finally a new ECE-regulation on LED lamps is on its way to become adopted by WP.29. How will the informal group deal with this and similar new developments, can they be incorporated in the provisions for the IWVTA after discussion within the informal group, until when is incorporation possible or shall the informal group exclude new regulations from being part of IWVTA for the time being? At a certain moment the informal group should make a decision such that everybody knows the targets of the informal group.

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