

Transmitted by the expert from OICA

## REQUEST FOR COMMENTS

Note: The text reproduced below was prepared by the expert from OICA in order to collect the views of the Contracting Parties to the '58 Agreement about some possible alignment of the UNECE regulatory system on the existing EU Directive 2007/46/EC regarding the extension of existing approvals.

### **Current system in EU**

The EU in its Directive 2007/46/EC clearly differentiates between a "revision" and an "extension" of an existing approval. Both procedures are used in the case of a modification to an existing vehicle type approval and the distinction between the two procedures is a very convenient tool within the European approval system.

The approval authority can use the "revision" of an existing approval when some particulars (i.e. either administrative or technical data) recorded in the application document have changed. In this case, the approval authority simply issues the necessary revised pages of the information package.

The approval authority will use the "extension" of an existing approval when, in addition to the above, the changes to the vehicle or component type make new tests necessary, or if information in the EC type-approval certificate has changed, or if some new requirements (e.g. in an UNECE regulation applicable in the EU) enter into force. In this case, the approval authority issues an amended EC type-approval certificate.

### **Current system in UNECE**

The '58 Agreement does not contain any such distinction, however each UNECE regulation has provisions covering both cases, usually in paragraph 7 (modification of the type). The distinction between "revision" and "extension" is unfortunately not as clear as in the European Framework directive. The approval authority in the UNECE system is only required to communicate the confirmation or the refusal of the approval, and only the case of the extension of the approval is clearly mentioned. However, this "UNECE extension" is somewhat different from the "EC extension" because it covers all cases of confirmation of approval.

### **Proposal for an alignment**

It is proposed to modify this aspect of the UNECE regulatory system and model it on the existing EU Directive 2007/46/EC, via the introduction into UNECE regulations of the idea of "revision" of an approval, in parallel to the existing "extension" of an approval.

The manufacturers are indeed currently obliged to follow the route of an extension when they apply for a modification, even for the cases when a simple revision is sufficient. This is a burden for the manufacturers because they have to complete a full administrative dossier, but this is also a burden for the competent authorities that must treat this full dossier and eventually issue a certificate, even for small modifications.

### **Conclusion**

Such alignment would help both Industry and the relevant national administrations to decrease the paper burdens. It is also in line with the wish of the European Union to simplify the European type approval system and, last but not least, this would also help new contracting parties to join the ECE approval system.

OICA would appreciate receiving comments from the interested experts about the above proposal. Opinions of the delegates from contracting parties to the '58 Agreement that are not members of the European Union are particularly expected.

In case the idea receives some reasonable support, OICA is ready to prepare the proposals for amendments. Such proposals could serve, for the homologation experts, as examples and tools to make a careful assessment of the consequences that this idea, applied to a large extent, could have on the UNECE regulatory framework.

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