Simplification of ECE Type Approval Markings

Proposal for Lighting Devices based upon
TRANS-WP29-GRE-2004-24e
Current Requirements for the Presence of Markings

(a) Trade name or mark of the applicant

(b) Indications regarding the light source

(c) An approval marking consisting of a circle surrounding the letter "E" followed by the distinguishing number of the country which has granted approval, and the approval number; its first two digits indicate the most recent series of amendments, the remainder is assigned by the competent approval authority

(d) Additional symbols which refer to the technical substance of the individual Regulation, such as:

For headlamps:

the beam pattern (driving/passing); the direction of traffic; the class of beam (A, B, C); the lens being of plastic material; the maximum luminous intensity of the driving beam;

For lighting/signalling devices:

the kind of device; the class or category; the mounting; the activation with other devices ("/" for front fog lamps).
Note: If this headlamp incorporated a D.I, Position lamp and DRL, the markings would almost double in size!!
Examples of Typical Approval Markings
Example of Approval Marking
ECE R123 – AFS System

Right side of the system /vehicle

Left side of the system /vehicle

- a ≥ 8 mm (glass lens)
- a ≥ 5 mm (plastic lens)
The Requirement for Approval Markings

The presence of the approval marking is considered to be useful or even necessary mainly for two reasons:

(a) It is proof, in the legal sense, that the product in question has been approved in the context of the 1958 Agreement. Attention is drawn to items 4.2. and 4.3. of the Consolidated Resolution on the Construction of Vehicles (TRANS/WP.29/78/Rev.1);

(b) It can help to identify the origin of devices on vehicles in service and of those offered for sale as replacement or aftermarket parts.

The presence of the trade name or mark of the applicant can also be used to identify the origin of devices. The additional symbols may help to verify whether a device belongs to the vehicle it is installed on and/or whether it is mounted correctly.
The present system of markings for headlamps is complex and difficult to apply, even for experts familiar with the subject.

It has also been mentioned that the marking system for other lighting and light-signalling devices has certain drawbacks.

One example is the indication of the series of amendments for those Regulations which cover several kinds of devices, such as Regulation No. 7. A change of requirements which implies a new series of amendments for one kind of device may have consequences for the marking of other devices which are not affected by the change.
Regulations 3, 4, 5, 6, 7, 19, 23, 31, 38, 50, 56, 57, 65, 72, 76, 77, 82, 87, 91, 98, 112, 113, 119 and 123.

The provisions regarding markings should be amended to require the presence of markings as follows:

(a) The trade name or mark of the applicant

(b) An approval marking consisting of a circle surrounding the letter "E" followed by the distinguishing number of the country which has granted approval and an approval number assigned by the country which has granted approval

The same Contracting Party may not assign the same number to any other type of lighting or light-signalling device. This would also apply to grouped, combined or reciprocally incorporated lamps, or to lamps reciprocally incorporated with headlamps.
The proposed provisions would:

- comply with the legal requirements according to the 1958 Agreement

- permit identification of the applicant responsible for the device

- permit access to the approval records for the device maintained by the authority which has granted the approval

- be in line with the provisions regarding light source modules.
distinguishing number of the country which has granted the approval

Trade name or mark of the applicant shall be clearly legible and be indelibly marked on the device
Access to Approval Data

Enter into first page of website (Public open access)

This shows a full version of the approval marking

e.g

Drawings / Photos of devices
Manufacturer or applicant
Provides an explanation of the markings (See following Pages)

Access of authorised users to detailed data on the communication form

Access of authorised users to detailed test reports issued by the technical service and supporting data submitted by the applicant
<table>
<thead>
<tr>
<th><strong>ECE symbol</strong></th>
<th><strong>EC symbol</strong></th>
<th><strong>Lamp / meaning of the symbol</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td><strong>HEADLAMPS</strong></td>
</tr>
<tr>
<td>R</td>
<td>R</td>
<td>A headlamp with a main-beam function</td>
</tr>
<tr>
<td>C</td>
<td>C</td>
<td>A headlamp with a dipped-beam function</td>
</tr>
<tr>
<td>H</td>
<td>H</td>
<td>Together with R and/or C indicates a halogen filament lamp</td>
</tr>
<tr>
<td>D</td>
<td>D</td>
<td>Together with R and/or C indicates a gas-discharge light source (&quot;Xenon&quot;)</td>
</tr>
<tr>
<td>HS</td>
<td>HS</td>
<td>HSB-lamp</td>
</tr>
<tr>
<td>X</td>
<td></td>
<td>Adaptive Front-lighting Systems (AFS)</td>
</tr>
<tr>
<td>PL</td>
<td>PL</td>
<td>Headlamp (or AFS) with plastic lens</td>
</tr>
<tr>
<td>MD</td>
<td>PL</td>
<td>Headlamp (or AFS) with LED Module(s)</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>FRONT FOG LAMPS</strong></td>
</tr>
<tr>
<td>B</td>
<td>B</td>
<td>Front fog lamp class “B”</td>
</tr>
<tr>
<td>F3</td>
<td>F3</td>
<td>Front fog lamp class “F3” (new type)</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>MISCELLANEOUS LAMPS</strong></td>
</tr>
<tr>
<td>AR</td>
<td>AR</td>
<td>Reversing lamp</td>
</tr>
<tr>
<td>L</td>
<td>L</td>
<td>Rear registration plate lamp</td>
</tr>
<tr>
<td>K</td>
<td></td>
<td>Cornering lamp</td>
</tr>
</tbody>
</table>
Notes:

a) The proposal to delete the requirement for all additional symbols will also affect the symbols mentioned in the installation Regulations. This would require suitable amendments to such Regulations.

b) Discussion is required concerning the possible use of the database to provide self certification information.