

**UN Regulation No. 67 (LPG vehicles)**  
Draft proposal for Supplement 15 to the 01 series of amendments

**I. PROPOSAL**

*Paragraph 4.1 and 4.2., amend to read:*

**4. Markings**

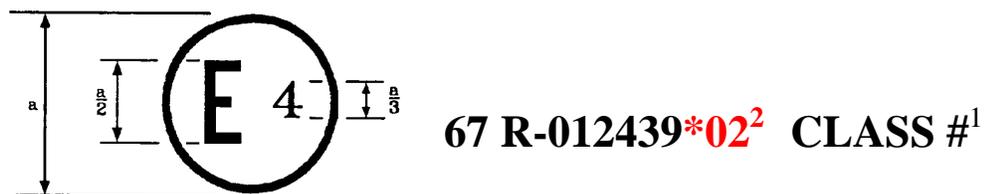
- 4.1. All components submitted for approval shall bear the trade name or mark of the manufacturer and the type, **variant, version**; and for non-metallic components also the manufacturing month and year; this marking shall be clearly legible and indelible.

*Annex 2A, amend to read:*

**Annex 2A**

**Arrangement of the LPG equipment type approval mark**

(See paragraph 5.4. of this Regulation)



$a \geq 5 \text{ mm}$

<sup>1</sup> Class 0, 1, 2, 2A or 3

<sup>2</sup> Number of extension

The above approval mark affixed to the LPG equipment shows that this equipment has been approved in the Netherlands (E 4), pursuant to Regulation No. 67 under approval number 012439, **second extension of type-approval**. The first two digits of the approval number indicate that the approval was granted in accordance with the requirements of Regulation No. 67 as amended by the 01 series of amendments. **The number of extension (02 in the example) is preceded by an asterix.**

## II. JUSTIFICATION

As stated in ECE/TRANS/WP.29/GRSG/2017/10, GRSG-112-20 and ECE/TRANS/WP.29/GRSG/2017/30, the currently used components labelling system has significant drawbacks. The identification of the components, for which the type-approval certificates were issued, is insufficient and therefore shall be changed.

Regulation No. 67 does not envisage such concepts as versions and variants of a given type, i.e. the manufacturing of technically differentiated products, covered by a single type-approval certificate. However, the practice of the type-approval activities under Regulation No. 67 has long ago introduced the notion of a version and variant of a type of device into the type-approval certificates. The absence of relevant provisions defining the type permits the approval of completely different products and covering them with one single type-approval certificate.

In practice, in many cases it is not possible to unambiguously associate a component, only by its marking, with the list of version and variants included in the type-approval certificates, so that the LPG system installers are unable to verify the components and may make mistake assembling the necessary components, while fitting the gas-installation kit in the vehicles.

There is currently no link between the designation of the components and the changes to their design resulting from periodic technical changes, which are covered by subsequent extensions of the type-approval certificate, but do not affect the component type-approval marking.

It is therefore proposed to introduce the obligation to label the products with the designation of the version, variant and the number of type-approval certificate extension based on which the product was approved for sale. This will ensure combining the technical documentation with the product designation and will improve the ability to verify the design of the components.

1. Introducing the obligation to mark the variant and version on the component (4.1.).
2. Introduction of the type-approval certificate extension marking by modifying the type-approval labelling (Annex2A), according to the slightly modified AEGPL proposal contained in GRSG-112-20. The modification involves the application of the proposed type-approval marking for all components covered by UN Regulation No. 67, i.e. the extending its applicability.

### **Comment to ECE/TRANS/WP.29/GRSG/2017/30**

The proposed changes in the labelling presented in ECE/TRANS/WP.29/GRSG/2017/30 is based on the addition of the designation - "technical modification", i.e. essentially the version or variant to the type-approval marking for the gas tank accessories only. In our opinion this is an ineffective action since this proposal does not provide a clear definition of "technical modification". If so, there is the possibility of freely modifying the product under this "technical modification", that is, the labelling status may improve but will not lead to the systemic changes. There is also no indication of the type-approval certificate extension. Creating such exceptions is also a wrong direction of action, i.e. separate markings only for the selected group of components, instead of making system changes, when possible.

Implementing the changes to the labelling of components is a positive and necessary step, but it will not substitute a well-defined component type definition, which is one of the key elements of the type-approval system. Therefore, the proposed revision of the labelling should be considered as complementary to the proposal ECE/TRANS/WP.29/GRSG/2017/10 on the definition of the component type, but refers to another area, so it can't be a substitute to that document.