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Agenda item 6

## UN-R90 Approval Numbering

Perceived consequences of changes included in revised 1958 agreement

# Current R90 Approval Number Format

The approval number for brake linings and discs and drums as currently specified in UNECER90 (and modified in ECE/TRANS/WP.29/GRRF/2015/22) is of the following form

*4.2 To each replacement part approved there shall be assigned an approval number comprising four groups of digits:*

*4.2.1. The first two digits (at present 02 for the Regulation in its 02 series of amendments) shall indicate the series of amendments incorporating the most recent major technical amendments made to the Regulation at the time of issue of the approval.*

*4.2.2. The following single digit shall indicate the category of the replacement part as follows:*

- A Replacement brake lining assembly*
- B Replacement drum brake lining*
- C Replacement brake disc*
- D Replacement brake drum*

*4.2.3. The next **series of** digits shall indicate the manufacture and the type of the brake lining, the type of disc or the type of drum.*

**The digital suffix shall indicate:**

*(a) the shoe or back plate or specific dimension in the case of drum brake linings;*

*(b) the **Test Group** in the case of a replacement disc or replacement drum.*

**The variants approved as a Test Group shall be listed as an appendix to the communication document:**

*Example: E11 02 C 00359 / 07248*

# Revised 1958 Agreement Approval Number Format

**An approval number shall be assigned to each type approved.** The type approval number shall consist of 4 sections. Each section shall be separated by the '\*' character.

Section 1: The capital letter 'E' followed by the distinguishing number of the Contracting Party which has granted the type approval.

Section 2: The number of the relevant UN Regulation, followed by the letter 'R', successively followed by:

(a) Two digits (with leading zeros as applicable) indicating the series of amendments incorporating the technical provisions of the UN Regulation applied to the approval (00 for the UN Regulation in its original form);

(b) A slash and two digits (with leading zeros as applicable) indicating the number of supplement to the series of amendments applied to the approval (00 for the series of amendments in its original form);

(c) A slash and one or two character(s) indicating the implementing stage, if applicable.

Section 3: A four-digit sequential number (with leading zeros as applicable). The sequence shall start from 0001.

Section 4: A two-digit sequential number (with leading zeros if applicable) to denote the extension. The sequence shall start from 00.

*Example: E11\*83R03/00/J\*2439\*01*

# Consequences/Concerns

- Test Groups can frequently contain multiple variants/part numbers (up to 30 is not unusual). Under the new system individual approvals would seem to be required for each variant within the Test Group adding considerable cost to the applicant with no safety benefit to the consumer relative to the current system
- Example: -  
Test Group with 30 variants: Current Cost = €15,000 > Future Cost = €450,000 (€15,000 \* 30)
- With regard to Extensions to existing approvals, it is the current understanding that if a current regulation approval under this proposal were to be extended as a consequence of the introduction of a new variant it would have to move to the new numbering system. That would seem to mean that the approval would have to be split and divided into several approvals if there were to be more than one variant on that approval, again adding cost to the applicant, and ultimately, the consumer, as the cost increases are passed down the supply chain
- Industry production printer systems are well adapted to marking/printing the UNECER90 number in the current format; the revised format will require considerable change and investment to accommodate the necessity to mark/print in a dual format – the current format for existing approvals (of which there are hundreds of thousands) and the new format for new approvals

# Proposal

- The proposed new numbering system will present major problems for industry and approval costs to surge unnecessarily for both industry and, ultimately, the consumer
- R90 already has a unique numbering system which is well established and provides clear product identification and traceability in the market place
- It is thus proposed that R90 should be exempt from the proposed change and the current R90 numbering system retained