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World Forum for Harmonization of Vehicle Regulations (WP.29)

Working Party on Passive Safety (GRSP) (Thirty-second session, 10-13 December 2002, agenda item B.5.4.)

PROPOSAL FOR COLLECTIVE AMENDMENTS TO REGULATIONS Nos. 11, 12, 14, 16, and 17

 $\frac{\text{Transmitted by the Expert from the International Organization of}}{\text{Motor Vehicle Manufacturers (OICA)}}$

<u>Note</u>: The text reproduced below was prepared by the expert from OICA in order to propose the deletion of the ECE approval marking, following the suggestion made during the one-hundred-and-twenty-seventh session of WP.29 to consider its acceptability at the respective Working Party (TRANS/WP.29/861, para.132).

Note: This document is distributed to the Experts on Passive Safety only.

PROPOSAL FOR DRAFT AMENDMENTS (SUPPLEMENT 2 TO 02 SERIES)

TO REGULATION No. 11

(Door latches and door retention components)

The list of contents, annexes,

Annex 2, should be deleted,

Annex 3, renumber as "Annex 2".

Text of the Regulation,

Paragraph 4.3., amend to read:

- "4.3. Notice of approval or of extension or of refusal of approval or production definitely discontinued of a vehicle type pursuant to this Regulation shall be communicated to the Parties to the Agreement which apply this Regulation, by means of a form conforming to the model in annex 1 to this Regulation. This form shall contain in its heading:
- 4.3.1. a circle surrounding the letter "E" followed by the distinguishing number of the country which has granted the approval; $\frac{1}{2}$ /
- 4.3.2. the approval number, as prescribed in paragraph 4.2. above."

Paragraphs 4.4. to 4.8., should be deleted (however, preserving footnote $\underline{1}/$).

Footnote 1/, amend to read:

1 for Germany, 2 for France, 3 for Italy, 4 for the Netherlands, 5 for Sweden, 6 for Belgium, 7 for Hungary, 8 for the Czech Republic, 9 for Spain, 10 for Yugoslavia, 11 for the United Kingdom, 12 for Austria, 13 for Luxembourg, 14 for Switzerland, 15 (vacant), 16 for Norway, 17 for Finland, 18 for Denmark, 19 for Romania, 20 for Poland, 21 for Portugal, 22 for the Russian Federation, 23 for Greece, 24 for Ireland, 25 for Croatia, 26 for Slovenia, 27 for Slovakia, 28 for Belarus, 29 for Estonia, 30 (vacant), 31 for Bosnia and Herzegovina, 32 for Latvia, 33 (vacant), 34 for Bulgaria, 35 (vacant), 36 for Lithuania; 37 for Turkey, 38 (vacant), 39 for Azerbaijan, 40 for The former Yugoslav Republic of Macedonia, 41 (vacant), 42 for the European Community (Approvals are granted by its Member States using their respective ECE symbol), 43 for Japan, 44 (vacant), 45 for Australia, 46 for Ukraine, 47 for South Africa and 48 for New Zealand. Subsequent numbers shall be assigned to other countries in the chronological order in which they ratify or accede to the Agreement Concerning the Adoption of Uniform Technical Prescriptions for Wheeled Vehicles, Equipment and Parts which can be Fitted and/or be Used on Wheeled Vehicles and the Conditions for Reciprocal Recognition of Approvals Granted on the Basis of these Prescriptions, and the numbers thus assigned shall be communicated by the Secretary-General of the United Nations to the Contracting Parties to the Agreement."

Paragraphs 5.2.1., 5.2.2. and 6., amend the reference to "annex 3" to read "annex 2".

Paragraphs 8. to 8.2., amend to read:

"CONFORMITY OF PRODUCTION

The Conformity of Production procedures shall comply with those set out in the Agreement, Appendix 2 (E/ECE/324-E/ECE/TRANS/505/Rev.2) with the following requirements:

- 8.1. Every vehicle **approved pursuant to** this Regulation shall conform to the vehicle type approved as regards features capable of modifying the characteristics of door latches and door retention components or the manner in which they are fitted.
- 8.2. In order to verify conformity as prescribed in paragraph 8.1. above, a sufficient number of random checks shall be made on serially-manufactured vehicles bearing **approved pursuant to** this Regulation."

Paragraphs 9.2. and 10., amend to read:

".... applying this Regulation, by means of a communication form conforming to the model in annex 1 to this Regulation."

Annex 1,

The heading, amend to read:

"Annex 1

COMMUNICATION

(maximum format: A4 (210 x 297 mm))



issued by:	Name of administration
	• • • • • • • • • • • • • • • • • • • •
	• • • • • • • • • • • • • • • • • • • •

concerning: 2/ APPROVAL GRANTED
APPROVAL EXTENDED
APPROVAL REFUSED
APPROVAL WITHDRAWN

PRODUCTION DEFINITELY DISCONTINUED

Of a vehicle type with regard"

Item 10., should be deleted.

Item 11., renumber as item 10.

<u>Item 12.</u>, renumber as item 11, and the reference to footnote " $\underline{1}$ /" renumber as reference to footnote " $\underline{2}$ /".

Items 13. to 16., renumber as items 12. to 15.

Footnotes 1/ and 2/, amend to read:

- "1/ Distinguishing number of the country which has granted/extended/refused/withdrawn approval (see approval provisions in the Regulation).
- 2/ Strike out what does not apply."
- Annex 2, should be deleted.
- Annex 3, renumber as Annex 2.

PROPOSAL FOR DRAFT AMENDMENTS (SUPPLEMENT 4 TO THE 03 SERIES)

TO REGULATION No. 12

(Protection against steering mechanism)

Paragraph 4.2.3., amend to read:

- "4.2.3. Notice of approval or of extension or of refusal of approval or production definitely discontinued of a vehicle type pursuant to this Regulation shall be communicated to the Parties to the Agreement which apply this Regulation, by means of a form conforming to the model in annex 1 to this Regulation. This form shall contain in its heading:
- 4.2.3.1. a circle surrounding the letter "E" followed by the distinguishing number of the country which has granted the approval; $\frac{1}{2}$ /
- 4.2.3.2. the approval number, as prescribed in paragraph 4.2.2. above."

Paragraphs 4.2.4. to 4.2.7., should be deleted.

Footnote 1/, amend to read:

"1/ 1 for Germany, 2 for France, 3 for Italy, 4 for the Netherlands, 5 for Sweden, 6 for Belgium, 7 for Hungary, 8 for the Czech Republic, 9 for Spain, 10 for Yugoslavia, 11 for the United Kingdom, 12 for Austria, 13 for Luxembourg, 14 for Switzerland, 15 (vacant), 16 for Norway, 17 for Finland, 18 for Denmark, 19 for Romania, 20 for Poland, 21 for Portugal, 22 for the Russian Federation, 23 for Greece, 24 for Ireland, 25 for Croatia, 26 for Slovenia, 27 for Slovakia, 28 for Belarus, 29 for Estonia, 30 (vacant), 31 for Bosnia and Herzegovina, 32 for Latvia, 33 (vacant), 34 for Bulgaria, 35 (vacant), 36 for Lithuania; 37 for Turkey, 38 (vacant), 39 for Azerbaijan, 40 for The former Yugoslav Republic of Macedonia, 41 (vacant), 42 for the European Community (Approvals are granted by its Member States using their respective ECE symbol), 43 for Japan, 44 (vacant), 45 for Australia, 46 for Ukraine, 47 for South Africa and 48 for New Zealand. Subsequent numbers shall be assigned to other countries in the chronological order in which they ratify or accede to the Agreement Concerning the Adoption of Uniform Technical Prescriptions for Wheeled Vehicles, Equipment and Parts which can be Fitted and/or be Used on Wheeled Vehicles and the Conditions for Reciprocal Recognition of Approvals Granted on the Basis of these Prescriptions,

and the numbers thus assigned shall be communicated by the Secretary-General of the United Nations to the Contracting Parties to the Agreement."

Footnote 2/ , amend to read:

"2/ See the footnote to paragraph 4.2.3.1."

Annex 1A, item 12., should be deleted.

Annex 1A, items 13. to 16., renumber as items 12. to 15.

Annex 2 Model A and Model B, should be deleted.

Annex 2, amend the word "Model C" to "Model A"

Annex 2, amend the word "Model D" to "Model B"

PROPOSAL FOR DRAFT AMENDMENTS (SUPPLEMENT 3 TO THE 05 SERIES)

TO REGULATION No. 14

(Safety-belt anchorages)

The list of contents, annexes,

Annex 2, should be deleted,

Annexes 3 to 8, renumber as "Annexes 2 to 7".

Text of the Regulation,

Paragraph 4.3, amend to read:

- "4.3. Notice of approval or of extension or refusal or withdrawal of approval or production definitely discontinued of a vehicle type pursuant to this Regulation shall be communicated to the Parties to the 1958 Agreement which apply this Regulation, by means of a form conforming to the model in annex 1 to this Regulation. This form shall contain in its heading:
- 4.3.1. a circle surrounding the letter "E" followed by the distinguishing number of the country which has granted the approval; $\frac{2}{}$
- 4.3.3. the approval number, as prescribed in paragraph 4.2. above."

Footnote 2/, amend to read:

"2/ 1 for Germany, 2 for France, 3 for Italy, 4 for the Netherlands, 5 for Sweden, 6 for Belgium, 7 for Hungary, 8 for the Czech Republic, 9 for Spain, 10 for Yugoslavia, 11 for the United Kingdom, 12 for Austria, 13 for Luxembourg, 14 for Switzerland, 15 (vacant), 16 for Norway, 17 for Finland, 18 for Denmark, 19 for Romania, 20 for Poland, 21 for Portugal, 22 for the Russian Federation, 23 for Greece, 24 for Ireland, 25 for Croatia, 26 for Slovenia, 27 for Slovakia, 28 for Belarus, 29 for Estonia, 30 (vacant), 31 for Bosnia and Herzegovina, 32 for Latvia, 33 (vacant), 34 for Bulgaria, 35 (vacant), 36 for Lithuania; 37 for

Turkey, 38 (vacant), 39 for Azerbaijan, 40 for The former Yugoslav Republic of Macedonia, 41 (vacant), 42 for the European Community (Approvals are granted by its Member States using their respective ECE symbol), 43 for Japan, 44 (vacant), 45 for Australia, 46 for Ukraine, 47 for South Africa and 48 for New Zealand. Subsequent numbers shall be assigned to other countries in the chronological order in which they ratify or accede to the Agreement Concerning the Adoption of Uniform Technical Prescriptions for Wheeled Vehicles, Equipment and Parts which can be Fitted and/or be Used on Wheeled Vehicles and the Conditions for Reciprocal Recognition of Approvals Granted on the Basis of these Prescriptions, and the numbers thus assigned shall be communicated by the Secretary-General of the United Nations to the Contracting Parties to the Agreement."

Paragraph 4.4. to 4.4.2., should be deleted.

Paragraph 4.4.3.(former), renumber as paragraph 4.2.1. and amend to read:

"4.2.1 In case of type approval according to the dynamic test of annex 6, the number of this Regulation shall be followed by the letter "e"."

Paragraphs 4.5. to 4.8., should be deleted.

Paragraphs 5.1., 5.4., 5.4.2.1., 5.4.2.4., 5.4.3., 5.4.3.5., 5.4.3.7.2., 5.4.3.7.3.1., and 7.1.1., replace the reference to "annex 3", to read "annex 2".

Paragraphs 5.1.1., 5.1.1.2., and 5.1.2., replace the reference to "annex 4", to read "annex 3".

Paragraph 6.3.4., 6.4.1.2., 6.4.1.3., 6.4.2.1., 6.4.2.2., 6.4.3., 6.4.5.1., and 6.4.5.2., replace the reference to "annex 5", to read "annex 4".

Paragraphs 5.3.2., 5.3.3., 5.3.4., 5.3.5., and 5.3.7., replace the reference to "annex 6", to read "annex 5".

Paragraphs 6.5., replace the reference to "annex 7", to read "annex 6".

Annex 1, item 15., should be deleted.

Annex 1, items 16. to 19., renumber as items 15. to 18.

Annex 2, should be deleted.

Annex 3 to Annex 8 (former), renumber as Annex 2 to Annex 7.

Annex 7 (former),

Paragraphs 3.2.4., replace the reference to "annex 8", to read "annex 7".

PROPOSAL FOR DRAFT AMENDMENTS (SUPPLEMENT 13 TO 04 SERIES) TO REGULATION No. 16

(Safety-belts)

Paragraph 5.2.3., amend to read:

- "5.2.3. Notice of approval or of extension or refusal or withdrawal of approval or production definitely discontinued of a vehicle type pursuant to this Regulation shall be communicated to the Parties to the 1958 Agreement which apply this Regulation, by means of a form conforming to the model in annex 1A to this Regulation. This form shall contain in its heading:
- 5.2.3.1. a circle surrounding the letter "E" followed by the distinguishing number of the country which has granted the approval; 1/
- 5.2.3.2. the approval number, as prescribed in paragraph 5.2.2. above."

Footnote 1/, amend to read:

1 for Germany, 2 for France, 3 for Italy, 4 for the Netherlands, 5 for Sweden, 6 for Belgium, 7 for Hungary, 8 for the Czech Republic, 9 for Spain, 10 for Yugoslavia, 11 for the United Kingdom, 12 for Austria, 13 for Luxembourg, 14 for Switzerland, 15 (vacant), 16 for Norway, 17 for Finland, 18 for Denmark, 19 for Romania, 20 for Poland, 21 for Portugal, 22 for the Russian Federation, 23 for Greece, 24 for Ireland, 25 for Croatia, 26 for Slovenia, 27 for Slovakia, 28 for Belarus, 29 for Estonia, 30 (vacant), 31 for Bosnia and Herzegovina, 32 for Latvia, 33 (vacant), 34 for Bulgaria, 35 (vacant), 36 for Lithuania; 37 for Turkey, 38 (vacant), 39 for Azerbaijan, 40 for The former Yugoslav Republic of Macedonia, 41 (vacant), 42 for the European Community (Approvals are granted by its Member States using their respective ECE symbol), 43 for Japan, 44 (vacant), 45 for Australia, 46 for Ukraine, 47 for South Africa and 48 for New Zealand. Subsequent numbers shall be assigned to other countries in the chronological order in which they ratify or accede to the Agreement Concerning the Adoption of Uniform Technical Prescriptions for Wheeled Vehicles, Equipment and Parts which can be Fitted and/or be Used on Wheeled Vehicles and the Conditions for Reciprocal Recognition of Approvals Granted on the Basis of these Prescriptions, and the numbers thus assigned shall be communicated by the Secretary-General of the United Nations to the Contracting Parties to the Agreement."

Paragraphs 5.2.4. to 5.2.7., should be deleted.

Footnote 2/ to paragraph 5.3.4.1.1., amend to read:

"2/ See the footnote to paragraph 5.2.3.1."

Annex 1A, items 1.3. and 1.3.1., should be deleted.

Annex 1A, items 1.4. to 1.6., renumber as items 1.3. to 1.5.

Annex 2, paragraph 1., should be deleted.

Annex 2, paragraph 2. (former), renumber as paragraph 1.

PROPOSAL FOR DRAFT AMENDMENTS (SUPPLEMENT 3 TO 07 SERIES)
TO REGULATION No. 17

(Strength of seats)

The list of contents, annexes,

Annex 2, should be deleted,

Annexes 3 to 9, renumber as "Annex 2 to 8".

Text of the Regulation,

Paragraph 4.3., amend to read:

- "4.3. Notice of approval or extension or refusal of approval or production definitely discontinued of a vehicle type pursuant to this Regulation shall be communicated to the Parties to the Agreement which apply this Regulation, by means of a form conforming to the model in annex 1 to this Regulation. This form shall contain in its heading:
- 4.3.1. a circle surrounding the letter "E" followed by the distinguishing number of the country which has granted the approval; 3/
- 4.3.2. the approval number, as prescribed in paragraph 4.2. above."

Paragraphs 4.4. to 4.4.2., should be deleted.

Paragraph 4.4.3.(former), renumber as paragraph 4.2.1. and amend to read:

"4.2.1 If the vehicle is equipped with one or more seats fitted or capable of being fitted with head restraints, approved as meeting the requirements under paragraphs 5.1. and 5.2. below, the approval number shall be preceded by the letters "RA". The form conforming to the model in annex 1 to this Regulation shall indicate which seat(s) of the vehicle is (are) fitted or capable of being fitted with head restraints."

Paragraphs 4.5. to 4.8., should be deleted.

Paragraphs 2.13., 2.14., 6.1.1., 6.2.1., 6.4.3.2., 6.5.2., and 6.5.3., replace the reference to "annex 3", to read "annex 2".

Paragraphs 6.5.1., and 6.6., replace the reference to "annex 4", to read "annex 3".

Paragraph 6.4.3.1., replace the reference to "annex 5", to read "annex 4".

Paragraphs 5.1.3., 5.1.3.1., 5.1.4.2., 5.1.4.3., 5.4.2.1., and 6.9., replace the reference to "annex 6", to read "annex 5".

Paragraphs 6.3.1., and 6.3.5., replace the reference to "annex 7", to read "annex 6".

Paragraphs 6.7., replace the reference to "annex 8", to read "annex 7".

Paragraphs 5.1.6., 5.15.1., 5.15.2., and 6.3.1., replace the reference to "annex 9", to read "annex 8".

Annex 1, item 17., should be deleted.

Annex 1, items 18. to 21., renumber as items 17. to 20.

Annex 2, should be deleted.

Annex 3 to Annex 9 (former), renumber as Annex 2 to Annex 8.

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B. JUSTIFICATION

The one-hundred-and-twenty-seventh session of WP.29, held in June 2002, resumed discussions on OICA informal document No. 15, originally submitted to the March 2002 WP.29 session.

Basically, this OICA proposal aimed at triggering discussions on the possibility to delete, in the various Regulations, the current system approval marking requirements. The text of this informal document No. 15 is reproduced in item C. below.

WP.29, after reviewing the OICA suggestion, concluded by asking OICA to prepare a concrete example for review by the appropriate Working Party, in order to test the acceptability of the proposal, so that the necessary amendments to other Regulations can be undertaken.

The above proposal responds to WP.29 request and is submitted to the consideration of GRSP.

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C. INFORMAL DOCUMENT No 15 SUBMITTED BY OICA TO WP.29 AT ITS ONE-HUNDRED-AND-TWENTY-SIXTH SESSION

I. The situation

Current ECE Regulations under the 1958 Agreement usually require an approval marking, allowing identification of the country having granted approval, the applicable version of the Regulation (e.g. series of amendments) and the approval number.

Such marking requirements apply to systems, components and technical units.

This OICA paper only addresses system marking.

II.Background of system approval marking in ECE Regulations

The current requirements for system approval marking were introduced in the early stages of the 1958 Agreement framework, with the aim to allow quick and easy identification of approved types and of the applicable ECE Regulation.

Clearly, such marking requirements were established at a time when the paper documentation process, without copy machines and, last but not least, without modern information technology, was unreliable, burdensome and time-consuming.

III. The problems of system approval marking

While system approval marking had a certain use in the past for easy identification, the situation of today has changed:

- System approval marking generally does not provide any added value to either customers, technical services or authorities. Some exceptions are obviously possible, such as the ECE R24 (diesel smoke) marking requirements.
- System approval marking is a burdensome process, duplicating other modern identification means.
- With current and modern information technology, authorities and technical services can easily check vehicle approval numbers, with all necessary documentation readily available. The system approval number on the vehicle itself is superfluous.
- Several countries, applying a type approval or certification system, do not require system approval marking in their national regulations.