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Concerning Cancellation of Mandatory Marking by Approval Marks

Transmitted by the Russian Federation

In a context of consideration of possible cancellation of mandatory marking of vehicles by approval marks, the Russian Federation would like to comment the following.

The practice of activity of the Administrative Department of the Russian Federation indicates that the vehicle manufacturers, who were granted the approvals pursuant to the ECE Regulations, can allow themselves deviations from a design of the officially approved vehicle type or a part of the serial production output.

Fulfilling the requirements of different countries, including, non-members of the 1958 Geneva Agreement, the manufacturer has the right, and, in many cases, is obliged to assemble vehicles that do not fully comply with the ECE Regulations. Especially it is actual for the manufacturers of those countries, which are not the contracting parties of the 1958 Geneva Agreement, but who export their products to the countries applying the ECE Regulations in their national legislation.

In such a case the absence of approval marks on vehicles hinders realization of the verification of conformity of production because of impossibility of identification of the vehicles.

The major objective of vehicle approval marking pursuant to the ECE Regulations is confirmation of conformity of that particular unit to the approved type by the manufacturer. Such assignment is used in verification procedures of conformity of production set by the ECE Regulations, where it is indicated that at periodic checks only the vehicles bearing the approval marks can be subjected for verification.

In the case of refusal from mandatory vehicle marking the described way of confirmation of conformity of the particular vehicle unit by the manufacturer is abolished. The different way of confirmation is not offered. Besides that, the introduction any of other way of confirmation will demand changing both the 1958 Geneva Agreement, and the ECE Regulations added to it.