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**ECONOMIC COMMISSION FOR EUROPE**

INLAND TRANSPORT COMMITTEE

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

Working Party on Pollution and Energy (GRPE)

(Forty-sixth session, 19-23 May 2003,  
agenda item 5.3.)

PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 101  
(Emissions of carbon dioxide and fuel consumption of M<sub>1</sub> and N<sub>1</sub> categories of vehicles)

Transmitted by the expert from the  
International Organization of Motor Vehicle Manufacturers (OICA)

Note: 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). The proposal is based on a document distributed without a symbol (informal document No. 8) during the forty-fifth session of GRPE (TRANS/WP.29/GRPE/45, para. 30). The suggested amendments to the Regulation are marked in **bold** characters.

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Note: This document is distributed to the Experts on Pollution and Energy only.

## A. PROPOSAL

Contents, list of annexes, amend to read (the secretariat suggests to reserve annex 4 for eventual later purposes in order to avoid renumbering of the subsequent annexes and appendices; i.e. the text of the annex should be deleted, but the title of "Annex 4" still remains):

"Annex 4: **(Reserved)**"

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 3 to this Regulation. **This form shall contain in its heading:**"

Insert new paragraphs 4.3.1. and 4.3.2., to read:

"**4.3.1. a circle surrounding the letter "E" followed by the distinguishing number of the country which has granted the approval; 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 2/).

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.

Annex 2, item 15., should be deleted.

Annex 2, items 16. and 18., renumber as items 15. to 17.

Annex 4, amend to read:

**"Annex 4**  
**(Reserved)**

**(The previous content of this Annex dealing with  
ARRANGEMENTS OF APPROVAL MARKS has been made obsolete.) "**

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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's request and is submitted for the consideration of GRSP.

## **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 of allowing 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 Regulation No. 24 (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.

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