Possible approach for harmonisation of marking requirements
The issue

The gtr’s under the 1998 Agreement

- Contain by definition only technical requirements,
- Do not specify anything on certification process,
- Therefore cannot contain certification marking requirements (administrative marking showing that the product in question meets the gtr)

⇒ Consequences:

- Existing national/regional marking requirements are retained (UNECE marking, US DOT marking, Chinese CCC marking, etc.) even after transposition of the gtr
- In spite of global technical harmonisation, products sold on the global market would still need to carry different markings, even if they strictly meet the gtr requirements
The different markings

- Typically, products may have to bear different types of marking:
  
  a) **Customer's (= driver's) relevant information** only:
     - Name / trade mark of manufacturer
     - Technical characteristics, e.g. dimension, material, function, etc.
     - Only needed for purchase decision or service/repair

  b) **Administrative certification data**
     - Approval system, authority, regulation number, approval number, factory code, …
     - Only relevant for certification and homologation issues

- **OICA proposes a stepwise approach to harmonize marking**
Example of approval marking on lights

- The legal requirement for markings on lighting equipment has increased to the point where it is difficult to retain their legibility:

```
00DC/R 27,5 PL 05051 05052 00DC/R 30 PL 05049 05050 00HCR 17,5 PL 05047 05048 E2 01 1 02A
```

**Note:** If this headlamp incorporated direction indicator, position lamp and DRL, the markings would almost double in size!!
Principle of the approach

Step #1:  
Harmonisation of „technical“ marking requirements only

Step #2:  
Creation of a „global certification database“, containing national/regional approvals

Step #3 .. #n: Gradually replace current approval marks on the product by an index (xxx), referring to the database of the national/regional approvals:

Corresponding national/regional laws:
• Own administrative marking
• Harmonized (gtr) technical marking
Usage of the “Global Database”

- Unique index number "XXX" specified by manufacturer to identify his product
- Manufacturer allocates a new file with this index in the global certification database and informs authorities about that index in his application documents
- Authorities then store the respective approval numbers in the database.
Resulting changes of marking
(example for tyres)

- After Step #1 (Harmonisation of “technical” marking):
  - No change in “technical” tyre markings – as it is already harmonized
  - Global harmonization of technical marking through gtr’s may be possible and beneficial for other components

- After Step #3 (Global index number gradually replaces current marking, starting with E-marking):

- After Step #n (“Global marking” is accepted worldwide):

![Diagram showing the changes in tire marking with link to global database and index number]
Step 1 - Summary

- **gtr**: harmonizes requirements on content and layout of marking regarding **manufacturer** and **technical characteristics** (i.e. **no administrative data**):
  - location and height of the text
  - permitted kind of fixing the marking on the component
  - technical characteristics required to be documented by a marking
  - coding of these characteristics in the marking

- **gtr**, including technical marking requirements, is transposed in the national/regional/58 Agreement regulations

- National/regional **administrative certification marking** (ECE, US DOT, CCC, …) remains **unchanged** for the time being
Steps 2...n - Summary

Second phase ("administrative" data):

- Creation of a global certification database containing all administrative data / certificates of the component (ECE, USDOT, others)

- Manufacturer determines unique index number XXX for his component

- Authorities store administrative/approval data for component XXX in database

- Current administrative certification marks on component are replaced by XXX
Advantages of that approach

- The substitution of the various national/regional certification marks by a unique index implies the following advantages:
  - Smaller marking ⇒ more flexibility in locating the mark
  - Future additional certifications for the same product are handled in the certification database only
    ⇒ no additional marking on the component
    ⇒ no problems with available space
    ⇒ no expensive stamping tool modifications
- The index number could allow direct read access to all approval documents assigned to the product
- The system is not necessarily limited to 58 or 98 Agreements, i.e. it could become a truly worldwide, unique system if all countries worldwide adhere to it