Submitted by the AMEVSC Secretariat

Informal document No. **GRRF-71-15** (71st GRRF, 13-15 September 2011 agenda item 3(a))

Alternative proposal to the amendment proposed in ECE/TRANS/WP.29/2011/36 - Proposal for amendments to Regulation No. 13 (Heavy vehicle braking)

Introduction:

The GRRF AMEVSC Informal Working Group in considering the amendment proposed in document ECE/TRANS/WP.29/GRRF/2011/36 is of the opinion that it is inappropriate for such an amendment to be included in Annex 21 as it is not only applicable to Annex 21, but to ECE Regulation as a whole. Therefore, the following amendment is proposed.

I. Proposal

New paragraph 3.5. to read:

"3.5. Any modification of a type-approved braking system which necessitates a new typeapproval shall result in the modifier informing the holder of the original braking system type-approval of the modification.

II. Justification

The modification of an already type-approved braking system may have implications that are not readily apparent. By requiring the organisation carrying-out the modification (the modifier) to inform the holder of the original type-approval, the Technical Service is provided with support in the evaluation of the modification, with regard to the views of the holder of the original type-approval. This requirement would also help with regard to product liability.