Extensions of type approvals

Request for guidance from GRRF

Background:
When asking for extensions for existing type approvals, vehicle manufacturers currently face different interpretations by different Approval Authorities.

One example for vehicle braking:
A vehicle has an existing type approval for its braking system according to regulation UNECE 13, Series 11, Supplement 2. This type approval is accepted by all countries signatory to UNECE Regulation No. 13, for their whole Vehicle Type Approval.

Supplement 4 of UNECE R13.11 has introduced new requirements for the Human Machine Interface.

The vehicle manufacturer opens a new production site and in consequence needs to extend the existing braking system type approval for the given vehicle. This does not change the vehicle type according to the criteria listed under item 2. of UNECE R13 (see the current list below):

2.2.1. in the case of power-driven vehicle,
2.2.1.1. the vehicle category, (see paragraph 1.1. above);
2.2.1.2. the maximum mass, as defined in paragraph 2.16. below;
2.2.1.3. the distribution of mass among the axles;
2.2.1.4. the maximum design speed;
2.2.1.5. a different type of braking equipment, with more particular reference to the presence or otherwise of equipment for braking a trailer, or any presence of an electric regenerative braking system;
2.2.1.6. the number and arrangement of the axles;
2.2.1.7. the engine type;
2.2.1.8. the number and ratios of gears;
2.2.1.9. the final drive ratios;
2.2.1.10. the tyre dimensions;

Even though the Supplement 2 is still accepted for whole Vehicle Type Approvals, the Authority which is asked for the extension of the existing braking system type approval requires conformity of the vehicle to the HMI requirements of supplement 4.

OICA believes that this interpretation is not in line with the application rules of the 1958 Agreement.

OICA requests guidance for interpretation by GRRF.