

PROPOSAL FOR DRAFT AMANDMENTS TO REGULATION No. 90
(Replacement brake linings)

Note: The text reproduced below was prepared by the expert from FEMFM in order to introduce clarification for the approval of "Identical" brake linings.

I. Introduction

With the latest amendment of Regulation No. 90 the scope of the regulation has been extended to the approval of replacement discs and drums. A new definition has been introduced for an "Identical part" which means a part that is chemically and physically identical to the original part except for the marking. These identical parts do not need to be tested for the purpose of the approval. It is the intention of this proposal to translate this approach into the approval of brake linings.

II. Proposal

Insert new paragraph 2.2.13., to read

"2.2.13 Identical brake lining assembly means a replacement brake linings assembly which is chemically and physically identical (*) with the exception of the vehicle and/or brake manufacturers mark, which is absent, to the original brake lining assembly."

Insert new paragraph 2.2.14., to read

"2.2.14 Identical drum brake lining means a replacement drum brake lining which is chemically and physically (*) identical with the exception of the vehicle and/or brake manufacturers mark, which is absent, to the original drum brake lining."

Insert new paragraph 5.1.2., to read

"5.1.2 Identical replacement brake lining assemblies and identical drum brake linings do not need to be tested to the requirements of paragraph 5.2, provided that the applicant for approval ~~can~~ demonstrates to the approval authority that he supplies the brake lining assemblies or the drum brake linings to the vehicle or brake manufacturer as original equipment for the specific model/models for which approval is being sought, and that he produces the parts under the same production and quality assurance system, **same COP compliance certificate** and conditions as for the original parts."

(*) Physically identical means identical in dimensions and the relevant mechanical properties and showing identical results in the COP tests (compressibility, shear stress and friction values) defined in point 5.3 of the regulation

III. Justification

1. As for discs and drums it seems logical that also brake lining assemblies or drum brake linings that are chemically and physically identical to the original part are deemed to satisfy all legal requirements related to the vehicle. Thus any new testing against the requirements of this regulation appears as a waste of recourses and money.

2. Obviously it is essential that the applicant can demonstrate to the authority that the part he is applying for approval is chemically and physically identical to the original part he is selling to the brake maker or directly to the vehicle manufacturer.
