

**Possibilities of Further Development of Type Approval
and Conformity of Production Inspection Procedures**

Transmitted by the representative of the Russian Federation

Note: This document contains proposals of the Russian Federation prepared with respect to consideration of the proposals of the United Kingdom “Enforcement of the type approval and conformity of production standards for motor vehicles” transmitted at the 77th Session of the WP.29/AC.2 on 5 November 2001 (document TRANS/WP.29/2002/28)

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The Russian Federation shares the position of the United Kingdom with respect to necessity of improvement of the type approval procedures within ECE system by means of:

- Improving quality of drafting of technical regulations;
- Providing common understanding of interpretation of homologation test procedures and inspections of conformity of production;
- Employing within WP.29 a system for resolving issues connected to interpretation of meaning of ECE Regulations;
- Improving availability of information for the authorities of the Contracting Parties to the 1958 Agreement with respect to decisions made in regards to homologation test results by presenting it in a standardized format on the designated Internet site;
- Developing procedures in regards to recalls of products, for which the type approval was recently granted, in case of qualified reasons.

The objective of related activities is increasing confidence of government authorities and consumers with respect to reliability of the ECE type approval system ensuring entering the marketplace only by safe product and applying appropriate penalties in case of discovered non-compliance of products to the recently certified samples.

The Russian Federation assumes expedient, for improvement of effectiveness of the ECE type approval system, to establish more detailed procedure of inspection of production conformity of certified products. The Russian Federation can present the related proposals based on the experience of national certification system for motor vehicles and trailers.

Supporting entirely the proposals of the United Kingdom as a base for improvement of the current process within the ECE system, the Russian Federation wishes to pay attention to one of the subjects related to the discussed problem: maintenance of same level of safety and ecology properties of the approved products during the time of their usage.

In the Russian Federation, the Consumer Protection Law (article 7, paragraph 2) prescribes that “the manufacturer is obliged to provide safety of goods within the entire period of usage, and, if such period is not established, - during 10 years”.

The regulations established by the 1958 Geneva Agreement in most cases do not establish the procedure of confirming maintenance of certified performance features at the time of vehicle utilization, although some unclear indications may be found (Regulation Nbs. 13, pp. 5.1.1.1., 5.1.1.2., Regulation No. 79, p. 5.1.4., etc.).

As a positive exception, the reference can be made to the Regulation No. 83-02 (and latest revisions), which Annex 8 prescribes conductions of special “endurance test for verifying the durability of pollution control devices” – (Type V Test) by 80 thousand km drive with periodical (every 10 thousand km) checking emission levels.

Currently the authorities of the Contracting Parties do not require carrying out by the manufacturer the Type V Test if certain level of deterioration coefficient with respect to specified emission levels can be confirmed during homologation tests.

However after entering into force Euro-3 requirements prescribing the specifications for on-board diagnostic system for emission control and checking of performance of that system by 80 thousand km drive test carrying out by the manufacturer, the related test shall be inspected by the authorities issuing the communications on type approval with respect to requirements of Regulation No. 83.

In accordance with the mentioned Consumer Protection Law, the Russian Certification Authorities, who issue the Type Approval Certificate of compliance to the aggregated prescribed parameters, are putting into practice inspection on carrying out by the manufacturers the Type V Test and evaluation of maintenance of certified performance features at normal conditions of product usage.

The important problem is inspection of emissions of trucks and buses equipped with diesel engines during exploitation. The ECE Regulation No. 49 specify certain regimes of bench testing of new diesel engines, but during exploitation engine emission shall be evaluated on a vehicle, where such engine is mounted. Thus essentiality of development of endurance test procedures for trucks and buses equipped with diesel engines and establishment of parameters, which can be correlated with those set by the ECE Regulation No. 49, becomes actual.

It should be taken into account that the parameters prescribed by the ECE Regulations Nos. 10, 13, 51, and 101 are established for the “normal conditions of usage”. Therefore it is considered expedient to inspect those parameters in accordance with procedures set by related regulations during endurance testing, which may be carried out or ordered by the manufacturer. An alternative approach is data on maintenance of certified parameters during exploitation that can be collected by the manufacturer through his dealer network by means of specific observations.

This kind of procedure may be regulated by the appropriate WP.29 document or by special provisions of the Consolidated Resolution on the Construction of Vehicles (R.E.3), which should order the authorities issuing the communications on type approval pursuant to ECE Regulations to inspect existence and effectiveness of manufacturer’s evaluation of maintenance of certified performance features at the time of inspection of production conformity.

Putting into certification practice Type V Test of ECE Regulation No. 83 is considered as the first effective step to the direction of inspection of certified performance features during product utilization.

As next steps, the similar test procedures developed in the framework of the other, including already mentioned, ECE Regulations Nos. 9, 10, 13, 24, 40, 41, 47, 49, 51, 63, and 101 can be established. Typical test conditions (cycles) for each vehicle category, inspection mileage, inspected parameters should be introduced. It is assumed that appropriate amendments to the mentioned regulations should be developed.

Conclusion

Joining to the proposals of the United Kingdom indicated in the document ?? .2-4 of 5 November 2001, the Russian Federation suggests:

4. For supporting the idea of access to certification test reports on a designated Internet site, to reach an agreement on necessary minimum of data to be registered in the official test reports pursuant to each Regulation.
2. For improving effectiveness of the ECE Type Approval System, to establish more detailed procedure of inspection of production conformity, and, basing on ISO-9000 (edition of 2000), to formalize criterions, which are voluntary at the present time.
3. To develop the procedure of confirmation of maintenance of certified product performance features by the manufacturer and legalize this procedure either as a WP.29 document or an addendum to the Consolidated Resolution R.E.3. To designate a list of ECE Regulations, in regards to which such procedure shall be adopted at first.
4. To prepare recommendations of the Contracting Parties concerning amending the Consolidated Resolution R.E.3 in regards to procedures of product recalls, including those products, which do not maintain certified performance features.