

TYPE APPROVAL AUTHORITIES MEETING

20 and 21 SEPTEMBER 2004 – PARIS, FRANCE

MEETING MINUTES

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TYPE APPROVAL AUTHORITIES MEETING
20 AND 21 SEPTEMBER 2004 – PARIS, FRANCE

Attendees:

Austria	Mr Bernhard Sittlinger, Mr Franz Wurst
Belgium	Mr Serge Cornet, Mr Michel Loccufier, Mr Philippe Dewolfs (1 st day only)
Estonia	Mr Athi Schultz
European Commission	Mr Wolfgang Schneider
Finland	Mr Björn Ziessler
France	Mr Jean Baptiste Avrillier (chairman), Mr Pascal Devigne, Ms Aurélie Martin, Mr Lionel Mis, Mr Christophe Polge, Mr Robert Rendu
Germany	Mr Sven Paeslack, Mr Frank Wrobel
Hungary	Mr Ákos Pajor
Iceland	Mr Einar Einarsson
Ireland	Mr Rory Brennan
Latvia	Mr Juris Dzintars
Luxembourg	Mr Romain Lamberty, Mr Claude Liesch
Netherlands	Mr Harry Jongenelen, Mr Freek Plancius
Norway	Mr Erik Sætre
Poland	Mr Wojciech Przybylski, Mr Andrzej Rutkowski
Slovenia	Mr Robert Jerončič
Spain	Mr Carlos Antón, Mr Victor Costa, Mr Javier Fadrique
Sweden	Ms Anna Ferner, Ms Ingela Sundin
Switzerland	Mr Heinz Berger, Mr Stefan Wenger
Turkey	Mr Abdullah Altinsoy, Mr Erhan Unsal
United Kingdom	Mr Derek Jones , Mr Rob Nixon
Not Represented:	Bulgaria, Cyprus, Czech Republic, Denmark, Italy, Lithuania, Malta, Portugal, Romania, Slovakia.

AGENDA

1. Opening of the meeting

2. Adoption of the Agenda

3. Adoption of the minutes from Bristol Feb 2004

4. Follow up on actions from the Bristol meeting

- 4.1 Review of member state's legal positions regarding approvals to 2001/43/EC (tyre noise) [[Bristol item 4.4](#)]

5. General items

- 5.1 . **2001/56/EC (Heating Systems)** : transmitted by France

6. Items relating to framework directive 70/156/EEC (motor vehicles)

- 6.1 Procedures and requirements for granting type CE approvals – [Estonia 1](#)
- 6.2 Single WVTA certificate for several manufacturers (70/156) -- [Poland 2](#)
- 6.3 Single vehicle type approval – [Estonia 2](#)
- 6.4 National codes and nationality ABBREVIATIONS: use of abbreviated country identifiers (70/156, as amended) - [United Kingdom 5](#)
- 6.5 Classification and bodywork (70/156) – [Germany 1](#) – [Poland 3](#)
- 6.6 Multistage and COC (70/156-2001/116) – [Netherlands 5](#)
- 6.7 Statutory plates (76/114-78/507) – [United Kingdom 4](#)
- 6.8 Statutory plates (70/156 ...) – [France 1](#)
- 6.9 Hinged and sliding doors (2001/31 and ECE Reg. 11) – [United Kingdom 1](#)
- 6.10 Use of cameras instead of conventional mirrors (2003/97) – [United Kingdom 2](#)
- 6.11 Definition of service doors (bus and coach directive : 2001/85) – [United Kingdom 3](#)
- 6.12 Reclining (foldable back) seats (2001/85) – [Netherlands 2](#)
- 6.13 Accessibility to a vehicle of class I (2001/85) – [Netherlands 6](#)
- 6.14 Bus and coach construction : marking of vehicles (2001/85) – [Germany 2](#)
- 6.15 M2 and M3 seat belt equipment (74/408-93/37 ; 76/115-96/38 ; 77/541-2000/3) – [Germany 3](#)
- 6.16 M2 and M3: strength of superstructure (2001/85) – [Slovenia 2](#)
- 6.17 Installation of lighting and light signalling devices (76/756 and ECE Reg. 48) – [Germany 4](#)
- 6.18 Parking brake control on trailer or semi trailer (71/321-98/12) – [Netherlands 1](#)
- 6.19 Rollover Stability. (ECE Reg. 111) – [Poland 4](#)
- 6.20 OFF-ROAD VEHICLE (symbol G) (2001/116 EC adapting to technical progress 70/156 EC) – [Spain 2](#)
- 6.21 Special purpose vehicles from existing M1 (2001/116 EC adapting to technical progress 70/156 EC) – [Spain 3](#)
- 6.22 Applicability of rear under run requirements to timber transportation vehicles (70/221-97/19 and ECE Reg. 58.02) – [Latvia 2](#)
- 6.23 Distinction between “new vehicle type” and “existing vehicle type” (several 70/156/EEC amending directives i.e. 2003/79/EC (indirect vision devices) – [Latvia 3](#)
- 6.24 Interpretation of certain vehicles rear under run requirements [Latvia 1](#)

7. Items relating to framework directive 92/61/EEC and 2002/24/EC (motor cycles)

- 7.1 Receiving documents (92/61-2002/24) – [Finland 1](#)
- 7.2 Extension of approvals granted for out-dated series of amendments (ECE Reg. 49) – [Poland 1](#)
- 7.3 Quadricycles with more than 15 kW - [Slovenia 1](#) and Norway query
- 7.4 COC documents (92/61) – [Finland 2](#)
- 7.5 Installation of lighting and light signalling devices (93/92 Annex IV, §6.4.9.) – [Switzerland 1](#)
- 7.6 Installation of lighting and light signalling devices (ECE Reg. 53 and 48) – [Netherlands 3](#)
- 7.7 Postponement of Euro 3 (97/24-2002/51) – [Netherlands 4](#) and [acem 1](#)
- 7.8 Characteristics of braking devices in quadricycles (93/14 and 2002/24) – [Spain 1](#)

8. Items relating to framework directive 74/150/EEC (agricultural and forestry tractors)

- 8.1 Agricultural tractors T1 and T3 – [Slovenia 3](#)

9. Miscellaneous

- 9.1 2002/24: 2-3 wheels emissions Germany
- 9.2 ETAES report

10. Next meetings (Q1 2005) – Location to be established

MEETING MINUTES

1. OPENING OF THE MEETING

The meeting delegates were welcomed by JB Avrillier, chairman of this session and a “tour de table” organised to present the delegates.

2. ADOPTION OF THE AGENDA

The agenda was accepted as presented and the following items were later withdrawn from the agenda version 6 distributed at the beginning of the meeting:

6.20 OFF-ROAD VEHICLE (symbol G) (2001/116 EC adapting to technical progress 70/156 EC) – Spain 2

6.21 Special purpose vehicles from existing M1 (2001/116 adapting to technical progress 70/156) – Spain 3

Under Miscellaneous:

9.1 Germany asked for a discussion about 2000/24 emission chapter ;

9.2 ETAES chairman asked to report about the last meeting of the group.

3. ADOPTION OF THE MINUTES FROM BRISTOL MEETING 2004

The minutes of the 4 and 5 February 2004 Bristol meeting were adopted without amendment

The Commission representative proposed that a decision report could be published on the Commission website after its adoption. The group agreed to make the agenda and the minutes available to all interested parties, starting with the meetings held in 2004. In order not to lose too much time and to make a publication possible before the following TAA-Meeting it was accepted to adopt the minutes by written procedure.

VCA will send the Bristol report (summary) and agenda to the Commission.

4. FOLLOW UP ON ACTIONS FROM THE BRISTOL MEETING

4.1. Review of member state’s legal positions regarding approvals to 2001/43/EC (tyre noise)

R30 and R54 amendments have been adopted and will be soon in force; the problem will be actually solved as soon as these amendments will be applied.

Nevertheless UK will send to Commission a proposition to clarify the applicability of Annex 5.

5. GENERAL ITEMS

5.1. 2001/56/EC (heating systems):

French proposition of amendment has been written and will be soon transmitted to Commission.

6. ITEMS RELATING TO FRAMEWORK DIRECTIVE 70/156/EEC (MOTOR VEHICLES)

6.1. Procedures and requirements for granting type CE approvals

Question : Procedures and requirements the Type Approval Authority must fulfill for granting the EU Type Approval ?

Decision : The question has not been discussed.

6.2. 70 Single WVTA certificate for several manufacturers (70/156)

Directive : FRAMEWORK DIRECTIVE – MOTOR VEHICLES

Subject : SINGLE WVTA CERTIFICATE FOR SEVERAL MANUFACTURERS.

Discussion : In the course of filling registration database of M1 category vehicles approved according to Directive 70/156 as recently amended we had noticed that one of WVTA's was issued for several vehicle trade names (manufacturers). The vehicle type code is one but VIN manufacturer identification segment indicates multiple manufacturers. We would therefore appreciate an advice with regard to the correct use of vehicle type definition (annex 2).

Question : What would be decision of your TAA:
A) accept such situation without any problem as the only valid think in this affair is mutual recognition of EWVTA's,
B) other decision or comments (please, specify)

Decision : All delegates agreed with the fact that there must be only one manufacturer and one type per WVTA. However it is allowed to have several trade marks per WVTA. Some delegates explained that there are sometimes several WMI for only one manufacturer.

6.2. Single vehicle type approval

Question : How the system is organized in other Member States ?
Mutual recognition of single Vehicle Type Approval ?

Decision : Single vehicle type approvals are excluded from the framework Directive; each country has different rules for delivering single vehicle type approvals.

6.4. National codes and nationality ABBREVIATIONS: use of abbreviated country identifiers (70/156, as amended)

Decision : VCA transmitted this document only for information and not for discussion; this subject will be treated by Commission.

6.5. Classification and bodywork (70/156)

Discussion : Annex II of directive 70/156/EEC defines in part A the vehicle classes (M,N and O) together with the type of bodywork (AA – AF, BA – BD..) in part C. New generations of vehicles are more and more designed in various bodywork. There are platforms used for all kinds of bodywork and classes (M and N). Only slight design or interior / exterior differences make a N₁ to be a M₁ and an AF out of a AA or AC bodywork for example.
Although the differences along the borders between those categories, classes and bodywork are very small, the national taxation and insurance categories are based on them.

Question : Are the categories are still 'up to date' and if not shall they be amended to new categories like: Crossover, SUV, pick-up...etc.

Suggestion : **A** - The classes, categories and bodywork definitions are sufficient for all kind of vehicles.
B - The classes, categories and bodywork definitions are **not** sufficient for all kind of vehicles.

Discussion : An in-depth analyse of WVTAs shows that some TAAs agree for assigning several body codes (mostly AA, AB, AC and AF) for purely the same real body design (shape, dimension, material etc.). We wonder if acceptance of manufacturer's declaration does not seem to be in contradiction to the spirit of annex 2 of FD, even if the current body code definitions are far from being precise. The item was formerly raised at TAAM by other countries but we did not notice any visible progress in nowadays approval practice.

Question : What would be decision of your TAA:
A) support more precise definitions and agree for only one body style code for one car body design
B) other decision or comments (please, specify)

Decision : ISO definitions are out of date; it would be necessary to propose clarification or evolution of bodywork definitions. In any case the body work codes cannot be linked with national taxation in the scope of the framework Directive.

6.6. Multistage and COC (70/156-2001/116)

Directive : 70/156/EEC - 2001/116/EC ANNEX XIV PARAGRAPH 1 POINT 1.1

Subject : MULTI-STAGE APPROVAL WITHOUT FIRST STAGE APPROVAL CERTIFICATE AND CERTIFICATE OF CONFORMITY?

Text : **2001/116/EC, Annex XIV Procedures to be followed during multi-stage EC type-approval**

1. General

1.1. The satisfactory operation of the process of multi-stage EC type-approval requires joint action by all the manufacturers concerned. To this end approval authorities must ensure, *before granting first and subsequent stage approval*, that suitable arrangements exist between the relevant manufacturers for the supply and interchange of documents and information such that the completed vehicle type meets the technical requirements of all the relevant separate Directives as prescribed in Annex IV or Annex XI. Such information must include details of relevant system, component and separate technical unit approvals and of vehicle parts which form part of the incomplete vehicle but are not yet approved.

2001/116/EC, Annex IX, model EC Certificate of conformity for complete/completed vehicles

Attachments (only applicable to multi-stage vehicle types): certificate of conformity for each stage.

2001/116/EC, Annex IX, part II, model EC Certificate of conformity for incomplete vehicles

point 0.6.

Base Vehicle: Manufacturer: ...

EC type-approval number: ...

Question : Is it possible to grant a second or subsequent stage approval without a first stage approval certificate and a certificate of conformity?
E.g. a second stage approval certificate for a camper is based on certificates and test reports from both the manufacturer of the chassis and the manufacturer of the bodywork. There is no first stage approval from the chassis manufacturer available. Furthermore there is no first stage approval number mentioned in the second stage approval certificate and on the base-vehicle plate. In this particular case you are in fact granting an approval for a **complete** vehicle instead of a **completed** vehicle.

Suggestion : No. In our opinion and in accordance with the text of Annex XIV there always has to be a first stage approval certificate and therefor a certificate of conformity for this first stage.

Decision : It is possible to deliver a second stage approval without a first stage approval certificate, if a certificate of origin of the vehicle exists in agreement with Annex XV of 70/156.
E.g. item 10 of Article 2 of 98/14.

6.7. Statutory plates (76/114-78/507)

Subject : LOCATION AND VISIBILITY OF VIN STAMPING ON CHASSIS

Discussion : VCA has been approached by a manufacturer who wants to put a vehicle's Vehicle Identification Number (VIN) stamping on the vehicle's body floor structure under a flap of carpet that can be accessed only when the seat has been moved to its rearmost position. An added complication is that the vehicle has electric adjustment for the seats so it is necessary to have the ignition key and battery power in order to move the seat.
The key issue is that the legislation requires the VIN stamping to be clearly visible and accessible and VCA would like to seek the views of the other authorities about the acceptability of the above VIN location.

Text : *The vehicle identification number is a fixed combination of characters assigned to each vehicle by the manufacturer. Its purpose is to ensure that every vehicle can be clearly identified over a period of 30 years through the intermediary of the manufacturer, without there being a need for reference to further data. The vehicle identification number must conform to the following requirements:*

It must be marked on the manufacturer's plate, and also on the chassis, frame, or other similar structure.

The identification number must, moreover:

- be marked on the chassis, frame or other similar structure, on the right-hand side of the vehicle.
- be placed in a **clearly visible and accessible** position by a method such as hammering or stamping, in such a way that it cannot be obliterated or deteriorate.

Suggestion : The intended purpose of the chassis stamping on the vehicle's chassis (or body structure) is to provide a secure identification for the vehicle throughout its normal service life.

Day to day information about the vehicle identity is readily available from the manufacturer's VIN plate and, therefore, access to the VIN stamping on the chassis is only really necessary on rare occasions when a suspect vehicle identity needs to be verified by, for example, the police. In these circumstances it could be argued that instant visibility is not absolutely necessary provided the VIN stamping can be easily accessed without the need for special tools (the Police can get information about the location of the VIN stamping from the vehicle manufacturer, if necessary).

Indeed, several authorities have already granted approvals for vehicles with VIN stampings located behind flaps in the interior trim or carpets. The key issue here, therefore, is not about the acceptability of a flap but whether the flap itself should be clearly visible without the need for a seat (or other vehicle component) to be moved to enable the flap to be seen and accessed.

N.B. In the case of the vehicle described in this paper, an additional issue is that it would be necessary to have the vehicle key to activate the electric seat before being able to access the VIN stamping. However, it could also be necessary to have the key to open the door to see a VIN stamping on the B Post or to pull the bonnet release to access a VIN stamping located in the engine compartment.

A - It is acceptable to move vehicle components and/or trim to gain access to the VIN stamping provided that it can be accessed and read without the need for special tools.

(In this context the vehicle ignition/door key is not considered to be a special tool)

B - The VIN stamping may be located under a flap in the vehicle trim (or carpet) but the flap itself must be easily visible and accessible without any need to move vehicle components.

<p><i>Decision</i> : Most of the delegates agreed with solution A: the vehicle ignition/door key should not be considered as a special tool.</p>
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6.8. Statutory plates (76/114, 93/84, 2002/24)

Directive : 93/34/EEC AS AMENDED BY 99/25/EC
Subject : DEFINITION OF THE MANUFACTURER'S PLATE

Question : The item 2.1 of the directive requires that "a manufacturer's data plate [...] must be firmly attached, at an easily accessible point, to a part which is normally not likely to be replaced during use".

French authority would like to know if engraving the drawing of the manufacturer's data plate according to the model which is shown in Appendix 1 by cold striking on the frame (next to VIN) can be accepted as a plate by the other authorities.

Decision : Engraving the drawing of manufacturer's data plate (A) can be accepted as long as it satisfies to the dimensions legibility and requirements; it is actually the best way that is "firmly attached to the vehicle" (B) and "normally not likely to be replaced during use".

6.9. Hinged and sliding doors (2001/31 and ECE Reg. 11)

Directive : 2001/31/EC AND ECE R11 (DOOR LATCHES & HINGES)
Subject : DEFINITIONS OF HINGED AND SLIDING DOORS

Question : Directive 70/387/EEC, as amended by 2001/31/EC, prescribes requirements for hinged doors and ECE Regulation 11 has requirements for both hinged and sliding doors. VCA has a working interpretation to differentiate between hinged and sliding doors but would like to seek the opinion of the other authorities.

Suggestion : **Hinged doors** are doors that open by swinging outwards away from the vehicle body such that, when open, the door is at angle to the door aperture.

Sliding doors open by moving outwards and rearwards (or forwards) from the door aperture with the door remaining nominally parallel to the vehicle's longitudinal axis throughout this movement. As such, sliding doors can move by means of a slide and roller mechanism or by means of a mechanical linkage system (e.g. front doors on some buses/coaches).

Decision : All delegates agreed with VCA interpretation.

6.10. Use of cameras instead of conventional mirrors (2003/97)

Directive : 2003/97/EC (DEVICES FOR INDIRECT VISION)
Subject : USE OF CAMERAS INSTEAD OF CONVENTIONAL MIRRORS

Text : **PREAMBLE**

(3) In the light of the experience gained and the present state of the art, it is now possible to amplify certain requirements of Directive 71/127/EEC with a view to improving road safety and to permit the use of mirrors to be **supplemented** by other technologies.

Definitions describe devices for indirect visions can be conventional mirrors

ANNEX I - DEFINITIONS AND ADMINISTRATIVE PROVISIONS FOR EC TYPE-APPROVAL

1. DEFINITIONS

1.1. 'Devices for indirect vision' means devices to observe the traffic area adjacent to the vehicle which cannot be observed by direct vision. These can be conventional mirrors, camera-monitors or other devices able to present information about the indirect field of vision to the driver.

1.1.1. 'Mirror' means any device, excluding devices such as periscopes, intended to give a clear view to the rear, side or front of the vehicle within the fields of vision defined in point 5 of Annex III.

1.1.1.1. 'Interior mirror' means a device as defined in **point 1.1.1**, which can be fitted in the passenger compartment of a vehicle.

1.1.1.2. 'Exterior mirror' means a device as defined in **point 1.1.1**, which can be mounted on the external surface of a vehicle.

1.1.1.3. 'Surveillance mirror' means a mirror other than the ones defined in **point 1.1.1**, which can be fitted to the inside or outside of the vehicle in order to provide fields of vision other than those specified in point 5 of Annex III.

ANNEX III - REQUIREMENTS CONCERNING THE FITTING OF MIRRORS AND OTHER DEVICES FOR INDIRECT VISION TO VEHICLES

Mirrors

2. Number

2.1. Minimum number of compulsory mirrors

2.1.1. The fields of vision prescribed in point 5 shall be obtained from the minimum number on mandatory mirrors set out in the following table. Where the presence of a mirror is not requested on a mandatory base, this means that no other system for indirect vision can be requested on a mandatory base.

2.1.2. In case the described field of vision of a front mirror prescribed in point 5.6 can be obtained by another device for indirect vision that is approved according to Annex II, part B and that is installed according to this Annex, this device can be used instead of a mirror.

In case a camera/monitor device is used the monitor must exclusively show the field of vision prescribed in point 5.6 while the vehicle is moving forward with a speed up to 30 km/h. In case the vehicle is moving with higher speed or moving backwards the monitor can be used to display the field of vision of other cameras mounted to the vehicle.

5. Fields of vision (summary – headings only)

5.1. Interior rear-view mirror (Class I)

5.2. Main exterior rear-view mirrors Class II

5.2.1. Exterior rear-view mirror on the driver's side

5.2.2. Exterior rear-view mirror on the passenger's side

5.3. Main exterior rear-view mirrors Class III

5.3.1. Exterior rear-view mirror on the driver's side

5.3.2. Exterior rear-view mirror on the passenger's side

5.4. 'Wide-angle' exterior mirror (Class IV)

5.4.1. 'Wide-angle' exterior mirror on the driver's side

5.4.2. 'Wide-angle' exterior mirror on the passenger's side

5.5. 'Close-proximity' exterior mirror (Class V)

5.6. Front mirror (Class VI)

Devices for indirect vision other than mirrors

6. A device for indirect vision shall give such performances that a critical object can be observed within the described field of vision, taking into account the critical perception.

7. Obstruction of the driver's direct view caused by the installation of a device for indirect vision shall be restricted to a minimum.

8. For the determination of the detection distance in case of camera-monitor devices for indirect vision, the procedure of the Appendix to this Annex shall be applied.

9. Installation requirements for the monitor

The viewing direction of the monitor shall roughly be the same direction as the one for the main mirror.

10. Vehicles of category M₂ and M₃ and complete or completed vehicles of categories N₂>7,5t and N₃ having a special bodywork for refuse collection **may be equipped on the rear part of their bodywork with a device for indirect vision other than a mirror** in order to ensure the following field of vision.

10.1. The field of vision (see figure 12) must be such that the driver can see at least a flat horizontal portion of the road, which is bounded by:

— a vertical plane aligned on the furthest rear point of the complete vehicle and perpendicular to the longitudinal vertical median plane of the vehicle;

Suggestion : Directive 2003/97/EC, which repeals Directive 71/127/EEC, includes provisions for the use of cameras and other devices for indirect vision. However it is not totally clear whether cameras can now be used instead of existing mirrors or whether they can only be used to provide supplementary vision in addition that already achieved with mandatory conventional mirrors.

The Preamble suggests that cameras etc can be used to supplement (i.e. not replace) the use of conventional mirrors (i.e. material with a reflective surface).

The definitions section then identifies ‘devices for indirect vision’ as a general term to include mirrors and cameras etc.

‘Mirrors’ are then defined as a specific item in 1.1.1.

However, there is then some confusion because the definitions for ‘interior’ and ‘exterior’ mirrors cross refer back to point 1.1 (‘devices for indirect vision’) rather than point 1.1.1 (‘mirrors’). This suggests that interior or exterior mirrors could perhaps be any ‘devices for indirect vision’ (i.e. including cameras)

This confusion is then compounded by the definition of surveillance mirror, which does cross-refer to point 1.1.1. (Perhaps suggesting that the definitions for interior and exterior mirrors should also have been cross-referenced to point 1.1.1 and not point 1.1.)

Annex III point 2 then identifies the minimum number of compulsory mirrors and the field of view requirements for each mirror application are shown in section 5.

Annex III point 2.1.2 identifies an exception, front mirrors (point 5.6), that allows other ‘devices for indirect vision’ (e.g. a camera) to be used in instead of a mirror.

Annex III point 10 also identifies a specific case when a mirror can be replaced by a camera.

Therefore Annex III seems to specifically require mirrors for the prescribed fields of view and cameras are only allowed to replace mirrors in the specific examples identified by Annex III point 2.1.2 and Annex III point 10.

However, referring back to definitions, we still have the problem that interior and exterior ‘mirrors’ are defined according to point 1.1, namely ‘devices for indirect vision’ that according to the definition can include cameras – hence the possibility for confusion.

VCA INTERPRETATION

VCA ‘s opinion is that conventional mirrors must be used in all the mandatory applications shown in Annex III (with the allowed exceptions identified for sections 5.6 and 10). Cameras can then be used the supplement the vision achieved with the conventional mirrors provided that these cameras meet the relevant sections of the legislation related to devices for ‘indirect vision other than mirrors’.

A - Conventional mirrors are still required for the mandatory fitments identified in Annex III
Cameras can be used to supplement the vision available from the mandatory mirrors (e.g. blind spots)

B - Cameras can be used to replace mirrors in all applications

<i>Decision</i> : All delegates agreed with solution A; Commission explained that reference to item 1.1. within item 1.1.1.1. is not a mistake.

6.11. Definition of service doors (bus and coach directive : 2001/85)

Directive : 2001/85/EC (BUS & COACH DIRECTIVE)
Subject : DEFINITIONS OF SERVICE DOORS

Text : 2001/85/EC defines a service door :
Annex 1 : 2.5
'service door' means a door intended for use by passengers in normal circumstances with the driver seated.
Please consider the following vehicle (see Attachment) with :
Driver's door : A
Front passenger door : B
Rear hinged doors : C
Side sliding door : D
According to the definition above, doors B, C and D would be defined as service doors, as they would meet all the criteria of Annex 1 para 2.5.
There are a number of exemptions from the requirements regarding service doors for door B in the case where there is no access to the main passenger compartment covered by the following paragraphs :

- 7.6.1.7.1. the driver's compartment shall have two exits, which shall not both be in the same lateral wall; when one of the exits is a window, it shall comply with the requirements set out in paragraphs 7.6.3.1 and 7.6.8 for emergency windows;
- 7.6.1.7.2. one or two seats are permitted alongside the driver for additional people, in which case both the exits referred to in paragraph 7.6.1.7.1 shall be doors. The driver's door shall be accepted as the emergency door for the occupants of those seats, provided that the driver's seat, the steering wheel, the engine housing, the gear lever, the hand brake control, etc. do not constitute too great an obstruction. The door provided for those additional people shall be accepted as the emergency door for the driver. Up to five additional seats may be fitted in a compartment incorporating the driver's compartment, provided that the additional seats and the space for these seats comply with all requirements of this Directive and at least one door giving access to the passenger compartment complies with the requirements of paragraph 7.6.3 for emergency doors;
- 7.6.1.7.3. in the circumstances described in paragraphs 7.6.1.7.1 and 7.6.1.7.2, the exits provided for the driver's compartment shall not count as one of the doors required by paragraphs 7.6.1.1 to 7.6.1.2, nor as one of the exits required by paragraph 7.6.1.4, except in the case mentioned in paragraphs 7.6.1.7.1 and 7.6.1.7.2. Paragraphs from 7.6.3 to 7.6.7, 7.7.1, 7.7.2 and 7.7.7 shall not apply to such exits.
- 7.6.1.8. If the driver's compartment and seats adjacent to it are accessible from the main passenger compartment by means of a passageway complying with one of the conditions described in paragraph 7.7.5.1.1, no external exit is required from the driver's compartment.
- 7.6.1.9. If a driver's door or other exit from the compartment is provided in the circumstances described in paragraph 7.6.1.8, it may only count as an exit for passengers provided:
 - 7.6.1.9.1. it is not necessary to squeeze between the steering wheel and the driver's seat, in order to make use of that exit;
 - 7.6.1.9.2. it satisfies the requirements relating to the dimensions of emergency doors indicated in paragraph 7.6.3.1.

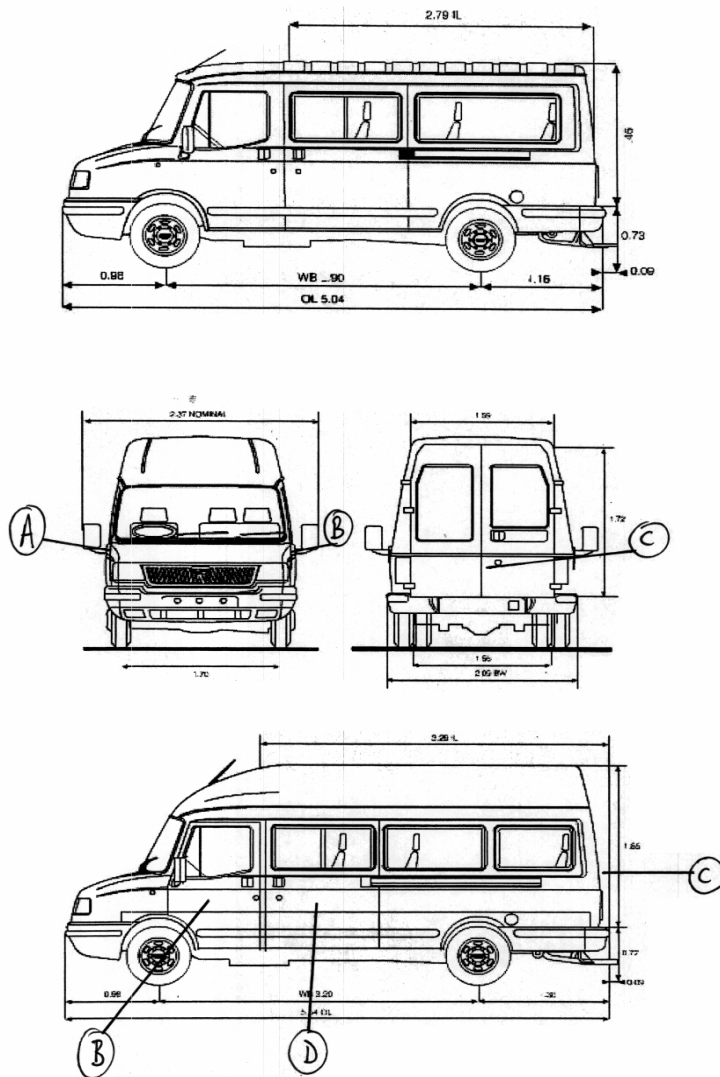
HOWEVER

The above exemptions do not include the requirements for illumination 7.8.1.3 and handholds 7.11.3.

- 7.8.1. Internal electrical lighting shall be provided for the illumination of:
 - 7.8.1.1. all passenger compartments, crew compartments, toilet compartments and the articulated section of an articulated vehicle;
 - 7.8.1.2. any step or steps;
 - 7.8.1.3. the access to any exits and the area immediately around the service door(s);
- 7.11.3.1. Door apertures shall be fitted with handrails and/or handholds on each side. In the case of double doors this requirement can be fulfilled by fitting one central stanchion or one central handrail.
- 7.11.3.2. Handrails and/or handholds to be provided for service doors shall be such that they include a grasping point available to a person standing on the ground adjacent to the service door or on any of the successive steps. Such points shall be situated, vertically, between 800 mm and 1 100 mm above the ground or above the surface of each step, and horizontally:
 - 7.11.3.2.1. for the position appropriate to a person standing on the ground, not more than 400 mm inwards from the outer edge of the first step, and
 - 7.11.3.2.2. for the position appropriate to a particular step, not outwards from the outer edge of the step considered, and not more than 600 mm inwards from that same edge.

- Suggestion* : **A** - Door B is a service door and therefore must comply with the requirements for illumination and handholds.
B - Door B is a service door but does not have to comply with the requirements for illumination and handholds.
C - Door B is not a service door.

Decision : Most of the delegates are in favour of solution A, but as some need more time for a final answer, UK will send a query to all TAAM members.



6.12. Reclining (foldable back) seats (2001/85)

Directive : 2001/85/EC ANNEX I PARAGRAPH 2 AND 7
Subject : RECLINING (FOLDABLE BACK) SEATS IN FRONT OF AN EMERGENCY WINDOW IN THE REAR FACE OF A BUS.

Text : **2001/85/EC, Annex I, paragraph 2 and 7:**

2. *Definitions*
 2.9. 'Emergency window' means a window, not necessarily glazed, intended for use as an exit by passengers in an emergency only.

7. *Requirements*
 7.6.3.1. The several kinds of exit shall have the following minimum dimensions: (see table on the right)

- 7.7.3. *Access to emergency windows*
 7.7.3.1. It shall be possible to move a test gauge from the gangway to the exterior of the vehicle through every emergency window.
 7.7.3.2. The direction of motion of the test gauge shall be in the direction in which a passenger evacuating the vehicle would be expected to move. The test gauge shall be kept perpendicular to that direction of motion.
 7.7.3.3. The test gauge shall be in the form of a thin plate having a size of 600 × 400 mm with corners radiused by 200 mm. However, in the case of an emergency window in the rear face of the vehicle, the test gauge may alternatively have a size of 1 400 mm × 350 mm with corners radiused by 175 mm.
 7.7.8. *Passenger seats and space for seated passengers*
 7.7.8.4.4. Measurements shall be taken with reclining passenger seats and adjustable driving seats with their seat backs and other seat adjustments in the normal position of use specified by the manufacturer.

			Class I	Class II and III	Remarks
Service door	Door aperture	Height (mm)	1 800	1 650	—
		Width (mm)	Single door:	650	
			Double door:	1 200	
Emergency door		Height (mm)	1 250		—
		Width (mm)	550		
Emergency window	Area (mm ²)	400 000		It shall be possible to inscribe in this area a rectangle of 500 mm × 700 mm	
Emergency window situated in the rear face of the vehicle. If the manufacturer does not provide an emergency window of the minimum dimensions prescribed above.			It shall be possible to inscribe in the emergency window aperture a rectangle 350 mm high and 1 550 mm wide. The corners of the rectangle may be rounded to a radius of curvature not exceeding 250 mm.		
Escape hatch	Hatch aperture	Area (mm ²)	400 000		It shall be possible to inscribe in this area a rectangle measuring 500 mm × 700 mm

Question : A row of seats in front of an emergency window in the rear face of a bus is equipped with foldable seat backs. Paragraph 7.7.3. concerning the access to the emergency window does not state the position these seat backs should be in. However paragraph 7.7.8. states that seat backs have to be in the normal position of use specified by the manufacturer.

Can we use the prescription from paragraph 7.7.8. for measuring the access to the emergency window in the rear face of the bus with the seat backs in the normal upright position?

Suggestion : Yes. For obvious safety reasons we think that the emergency window in the rear face of a bus should be accessible with the seat backs in the normal (upright) position.

Decision : Most of the delegates agreed with the suggested solution.

6.13. 2001 Accessibility to a vehicle of class I (2001/85)

Directive : 2001/85/EC ANNEX VII PARAGRAPH 3 POINT 3.6.2
Subject : ACCESSIBILITY TO A VEHICLE OF CLASS I WITHOUT A KNEELING SYSTEM.

Text : **2001/85/EC, Annex VII Requirements for technical devices facilitating access for passengers with reduced mobility.**
3.6. *Wheelchair accommodation provisions*
3.6.2. There shall be at least one doorway through which wheelchair users can pass. In the case of vehicles of Class I, at least one wheelchair access door shall be a service door. The wheelchair access door shall bear a boarding aid complying with the provisions of paragraph 3.11.2 (a kneeling system) of this Annex; this shall be in combination with the provisions of paragraph 3.11.3 (a lift) or 3.11.4 (a ramp) of this Annex.

Question : EC Directive 2001/85, Annex VII, point 3.6.2. requires a vehicle of Class I to have a kneeling system even if accessibility is guaranteed by means of a ramp or of a lift.

Why does the Directive require both a kneeling system and a ramp or a lift?

If we approve a vehicle of Class I according to this Directive without a kneeling system but with either a lift or a ramp will anyone object? (Accessibility to the vehicle is guaranteed!)

Suggestion : In our opinion if all requirements of Annex VII are met, we can grant an approval for a Class I vehicle without a kneeling system.

Decision : The requirement of the Directive is the existence of the kneeling system; all members agreed with the proposed solution but the Directive has to be amended before.

6.14. Bus and coach construction: marking of vehicles (2001/85)

Directive : DIRECTIVE 2001/85/EC, ANNEX I, PARAGRAPH 7.3.3
DIRECTIVE 97/27/EC, ANNEX I, PARAGRAPH 2.6 AND 2.7 AND ARTICLE 4

Discussion : Annex I, paragraph 7.3.3 requires the marking of vehicles clearly visible to the driver with the information of the mass of baggage which may be carried when the vehicle is loaded with the maximum numbers of passengers and crew and the vehicle is not exceeding the technically permissible maximum mass, or the permissible mass of any axle.

According to Directive 97/27/EC which is already quoted in 7.3.3.1.1. and 7.3.3.1.2. these masses are defined as follows:

- “Technically permissible maximum laden mass (M)” means the maximum mass of the vehicle based on its construction and performance, stated by the manufacturer. ... (97/27/EC, annex I, paragraph 2.6)
- “Technically permissible maximum mass on the axle (m)” means the mass corresponding to the maximum permissible static vertical load exerted by the axle on the road surface, based on the construction of the vehicle and of the axle and as stated by the vehicle manufacturer. ... (97/27/EC, annex I, paragraph 2.7)

The question of interpretation arises because Article 4 of 97/27/EC allows the member states to assign to the vehicles national registration/in-service maximum permissible masses according to their relevant national maximum authorized masses. If the calculation is based on these masses it will have different results and will lead to different markings in the member states.

Suggestion : **A** - Marking of vehicles is based on a calculation using the technically permissible maximum mass and the permissible mass of any axle as defined in directive 97/27/EC.
B - Marking of vehicles is based on a calculation using the relevant national maximum authorized masses.

Decision : 2001/85 requires a marking to give informations to the driver, however members are divided between solutions A and B.
Turkey will send its question for the next meeting.

6.15 M2 and M3 seat belt equipment (74/408-93/37 ; 76/115-96/38 ; 77/541-2000/3)

Directive : DIRECTIVES 74/408/EEC AMENDED BY 96/37/EC, 76/115/EEC AMENDED BY 96/38/EC AND 77/541/EEC AMENDED BY 2000/3/EC IN COMBINATION WITH THE OBLIGATION TO WEAR REQUIRED SEAT BELTS

Discussion : Certain vehicles of Class M2 and M3 are required to be equipped with seat belts. National legislation as well as the EC-directive 91/671/EEC amended by 2003/20/EC require the passengers to wear prescribed seat belts.

Seat belts are regarded as the best means to keep a passenger seated in case the vehicle tips over. Therefore the relevant directives have been amended to their present state.

Consequently the transportation of passengers in a recumbent position in seats, especially designed for the purpose to provide a flat surface, can no longer be permitted as this position renders the seat belt useless and as other restraint systems do not provide the same level of protection as seat belts.

Suggestion : **A** - The transportation of passengers in a recumbent position is no longer permissible.
B - The transportation of passengers in a recumbent position is still permissible

Decision : This is excluded from the scope of the Directive; EC is in favour of solution B.

6.16. M2 and M3: strength of superstructure (2001/85)

Question : Another problem is relate to M2 and M3 vehicles- What is the practice with testing the strength of superstructure and other requirements according to 2001/85/EC ?

Is this obligatory or not ? According to 2001/85/EC it should be obligatory after 13.february 2004?

Decision : Testing the strength of superstructure is required to 2001/85/EC, but the application of this Directive is optional. Geneva Regulation 66 is equivalent to strength of superstructure test required by 2001/85/EEC Directive.

6.17 Installation of lighting and light signalling devices (76/756 and ECE Reg. 48)

Directive : DIRECTIVE 76/757/ECC, ANNEX II
ECE-REGULATION 48, NUMBER 6.17.4.3 (SIDE-MARKER LAMPS)
6.18.4.3 (SIDE RETRO-REFLECTOR)

Discussion : There are particular problems to install the foremost side retro-reflectors and foremost side-marker lamps on semitrailers. Especially by semitrailers with foldable side-curtains it's not possible to fit the foremost side-marker lamp not further than 3 m from the front.

ECE-Regulation 48 determines in number 6.17.4.3 and 6.18.4.3 that the distance may increased to 4 m, if the structure of the vehicle makes it impossible to comply with such a requirement.

The question is, if this exception is only applicable for the distance between two side-marker lamps **or** if the exception is also applicable for the distance between the foremost one to the front.

Suggestion : **A** - The 4 m exception between the side retro-reflectors and the side-marker lamps (ECE-R 48) is also applicable for the distance between the side-marker lamps and the front

B - The 4 m exception between the side retro-reflectors and the side-marker lamps (ECE-R 48) is also applicable for the distance between the side-marker lamps and the front, but only under the following conditions:

One additional side retro-reflector must be fitted not further than 1 m from the front

C - The 4 m exception between the side-marker lamp and the side retro reflector is not applicable for the distance between the side-marker lamps and the front. The distance between the side-marker lamps and the front shall not exceed 3 m.

Decision : All members agreed with solution B, but as long as the Directive has not been modified, only C is applicable

6.18 Parking brake control on trailer or semi trailer (71/321-98/12)

Directive : 71/320/EEC - 98/12/EC ANNEX I PARAGRAPH 2
Subject : MORE THAN ONE PARKING BRAKE CONTROL ON A TRAILER OR SEMI-TRAILER.

Text : **98/12/EC, Annex I, paragraph 2:**
2.1.2.3. *Parking braking system*
The parking braking system shall enable the vehicle to be held stationary on an up or down gradient even in the absence of the driver, the working parts being then held in the locked position by a purely mechanical device. The driver shall be able to achieve this braking action from his driving seat, subject, in the case of a trailer, to the requirements of point 2.2.2.10.
The trailer compressed air braking system and the parking braking system of the towing vehicle may be operated simultaneously, provided that the driver is able to check, at any time, that the parking brake performance of the vehicle combination, obtained by the purely mechanical action of the parking braking system, is sufficient.
2.2.2.10. On every trailer which is required to be fitted with a service braking system, parking braking shall be ensured even when the trailer is separated from the towing vehicle. It shall be possible for a person standing on the ground to actuate the parking braking system; however, in the case of a trailer used for the carriage of passengers, it shall be possible to actuate this braking system from inside the trailer. The expression 'actuate' also covers the action of releasing.

Question : Is it allowed to use more than one parking brake control on a trailer or semi-trailer?

E.g. a special separable (left/right) trailer is build to take large loads. It is not possible to use spring brakes due to the limited space for the wheels and brakes. Because the trailer has to be separable (left/right) it is not possible to use one control (spindle) for the parking brake (no hoses or cables can run from left to right). Therefor the parking brake of the trailer is actuated by two controls using a spindle on the right side and another spindle on the left side of the vehicle.

Suggestion : We would like to know the opinion of the other TAAM participants concerning the use of more than one parking brake control on a trailer or semi-trailer.

***Decision* : It is not allowed to use more than one parking brake control on a trailer or a semi trailer.**

6.19 Rollover Stability. (ECE Reg. 111)

Directive : ECE REGULATION: NO. 111
Subject : ROLLOVER STABILITY

Question : ISSUE A:
If a calculation method is used as an alternative method according to point 5.3.1.2, is it acceptable to add to TA communication :
A) only the calculation report as specified in Annex 4 – Appendix?, or
B) is it required to add all the detailed calculations?

ISSUE B:
Provisions stipulated in 9.7.5.2 of European Agreement of ADR (International Carriage of Dangerous Goods by Road) relates to the lateral stability according to ECE Regulation No. 111 concerning the tank vehicles first registered as from July 1st 2003.
A) what is to be understood by first registration:
- is that the date in the countries who are contracting parties of ADR, or
- the date in a country where it is currently being operated?
B) is it expected and if so, when roll-over stability shall need to be checked for tank vehicles registered before 30.06.2003?

ISSUE C:
In Regulation No. 111 point 2.2 mentions different characteristics of tank vehicles.
Can we choose one version of a type with the most unfavorable lateral stability and after these tests issue a homologation certificate for all other types?

***Decision* : TAAM has to focus on Geneva Regulations which are included in the frame Directives, this Regulation is not within the TAAM's scope.**

6.20 OFF-ROAD VEHICLE (symbol G) (2001/116 adapting to technical progress 70/156)

Question : Some spanish manufacturers are working in special porpose vehicles from existing M1 complete vehicles from regular market, in example ambulances for people transportation from vehicles such as Mercedes-Benz Vito or Sprinter, Fiat Ducato, Opel Movano etc, which are approved as complete vehicles (without incomplete variants), or hearses from wagon model cars such as Mercedes-Benz E class, Volvo V70, BMW 5 series etc, always approved only as a complete vehicle.
The modifications introduced in the vehicle to be adapted for ambulances or hearses, are mainly related to interior changes and/or rear overhang dimensions.

Is it possible to grant an M1 completed vehicle approval when the base vehicle is a complete vehicle?

Decision : The question will be examined during next TAAM.

6.21 Special purpose vehicles from existing M1 (2001/116 EC adapting to technical progress 70/156 EC)

Subject : CHARACTERISTICS OF BRAKING DEVICES IN CUADRICYCLES

Text : 2.2.4. Every tricycle must be equipped with:
2.2.4.1. a **foot-controlled** serviced braking device which operates on **all** wheels, and a secondary (emergency) braking device which may be the parking brake; and
2.2.4.2. a parking braking device acting on the wheels of at least one axle. The control of the parking device must be independent of the control of the service braking device.

Suggestion : In the directive 2002/24 (Scope and definitions) the Art 1 . 3.b define :CuadricyclesThese vehicles shall be considered to be motor tricycles and shall fulfil the technical requirements applicable to motor tricycles of category L5e unless specified differently in any of the separate Directives
A - It's NOT possible to grant an approval (93/14) for ATV vehicles with a braking device where the pedal only control the rear axle, consequently the WVTA it's imposible
B - Yes it's possible to grant 93/14 and 2002/24 CE

Decision : The question will be examined during next TAAM.

6.22 Applicability of rear under run requirements to timber transportation vehicles

Directive : 70/221/EEC (97/19/EC) AND ECE R-58.01

Subject : APPLICABILITY OF REAR UNDERRUN PROTECTION REQUIREMENTS TO TIMBER TRANSPORTATION VEHICLES

Text : Paragraph 5.5. of the Directive and paragraph 1.2.3. of R-58.01 says that: ".....these requirements do not apply to the vehicles for which rear underrun protection is incompatible with their use".

Question : Some truck and trailer (semi trailer) timber vehicle importers claim that these vehicles are quite special ones and are being frequently used also in off-road conditions, so during use of these vehicles these devices will be broken anyway.
Nevertheless, on the other hand such vehicles are intended for transportation of timber materials by public roads. There are special forestry tractors and machinery intended for off-road use (in forests).
So, what is your experience in this field?
Does your TAA require RUPD for timber vehicles?
A) yes, since they are "normal" vehicles
B) no, since RUPD are not compatible with their use
C) depends on a case (some need it some do not)
D) other (please specify)

Decision : This possibility of rear under run protection is allowed by the Directive but the technical service has to decide if the rear under run protection is compatible with the use of the vehicle: as stated by Directive 70/221 Annex II" By way of derogation from the above mentioned requirements, vehicles of the following categories need not comply with the requirements of this Annex as regards rear under run protection"

6.23 Distinction between “new vehicle type” and “existing vehicle type” (several 70/156 amending directives i.e. 2003/79 (indirect vision devices))

Directive : SEVERAL 70/156/EEC AMENDING DIRECTIVES I.E. 2003/97/EC
Subject : DISTINCTION BETWEEN “NEW VEHICLE TYPE” AND “EXISTING VEHICLE TYPE”.

Text : There are no any “new vehicle type” and “existing vehicle type” definitions in the EC directives. However, they appear in transitional requirements of some directives. For instance, Paragraph 2 of Article2 of the directive 2003/97/EC (which amends 71/127/EEC) says:

“2. With effect from 26 January 2006, Member States shall prohibit the national type-approval for any **NEW TYPE** of vehicle on grounds relating to the device for indirect vision if the requirements of this Directive are not fulfilled.”

Question : It is clear with M1 or category vehicles and “new EC type- approvals” since these types either have or do not have ECWVTA according to 70/156/EEC or 2002/24/EC.

It is much more complex issue concerning National Type Approvals.

We believe that there can be three approaches:

- 1) to check whether any initial approval was granted in the country where application is received (there should be some distinction between amendments to an existing approval or new approval);
- 2) to find out whether for a particular vehicle type any National Type Approval (EU25 + EFTA) was granted;
- 3) focus on component type approvals i.e. if almost all components have extensions (*01, *02, *03, etc.) then it is unlikely that particular vehicle type is a “brand new” one.

Sometimes we receive National Type Approval applications from importers (for the first time in our country) yet to our opinion some component approvals are outdated as for “a new vehicle type” but valid for “an old” one.

Manufacturer (importer) says that it is “an old” type because in country “X” or “Y” they have already National Approval for this particular vehicle type since year “XYZ”.

So what is your experience concerning this issue?

How [generally] do you determine whether a particular vehicle type is “new” or “old” ?

- A) check already granted approvals in your country
- B) ask other TAA’s or manufacturer whether already any National Approval for this vehicle type already exists within EU & EFTA countries?
- C) look to component approvals (see above)
- D) according to manufacturer’s / importer’s opinion (declaration)
- E) special national procedures exist
- F) other (please specify)

Decision : It was explained that when it is a new manufacturer, it should be a new type whenever an European type approval has already been granted.

6.24 Interpretation of certain vehicles rear under run requirements

Directive : 70/221/EEC (97/19/EC)
Subject : INTERPRETATION OF CERTAIN VEHICLES REAR UNDER RUN REQUIREMENTS

Decision : The question will be examined during next TAAM.

7. ITEMS RELATING TO FRAMEWORK DIRECTIVE 92/61/EEC AND 2002/24/EC (MOTOR CYCLES)

7.1. Receiving documents (92/61-2002/24)

Directive : 92/61/EEC
Subject : RECEIVING DOCUMENTS

Text : 92/61/EEC

Directive 2002/24, CHAPTER II,
Article 6:

1. The competent authority in each Member State shall forward to those of the other Member States, within one month, a copy of the type-approval certificate, together with the annexes for each type of vehicle that they type-approve or refuse to type-approve.

In addition, at the request of a competent authority of another Member State, it shall send forthwith a copy of the type-approval certificate together with the annexes for each type of system, separate technical unit or component.

<i>Question</i>	<p>: What should be done if the competent authority of a Member State has not received the copy of the type-approval certificate together with the annexes? Can the authority wait until the documents are received?</p> <ol style="list-style-type: none">1. The approval exists and the approval data should be stored to the national approval databases of each country. The data should be picked out of the documents which the manufacturer has e.g. users guide and other technical documents.2. The approval exists but the approval data should not be stored to the national approval databases of each country as long as the documents have not yet arrived. Registrations can be made by using CoC-documents. The approval is concerned to be valid.3. The approval exists but the approval data should not be stored to the national approval databases of each country as long as the documents have not yet arrived. Registrations can not be made by using CoC-documents. The approval is concerned not to be valid and no vehicles can be registered. <p>Something else. What?</p>
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<i>Decision</i>	<p>: Some countries have difficulties to get the documents from other competent authorities who allow to register vehicles. The positions are shared as some are ready to use COC to register the vehicles and others will not as they have been already faced with falsified documents and some information are missing in these COC for the need of registration in some countries. In any case the information should be requested to the competent authority which has delivered the reception, and COC should be checked with this official information.</p>
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7.2. Extension of approvals granted for out-dated series of amendments (ECE Reg. 49)

Directive : ECE REGULATION: NO. 49
Subject : EXTENSION OF APPROVALS GRANTED FOR OUT-DATED SERIES OF AMENDMENTS.

Discussion : The ownership of the engine manufacturing company was changed without any modification in actual production facility, organisation and other arrangements like QAS, sub-suppliers network, product distribution channels etc. One of the engine types is still manufactured according to approval given to 02 series of amendments of Regulation No. 49 for the purpose to be exported to non EU member country. The new owner has applied for an extension of approval for the reason of the manufacturer's name change.
Our understanding of the administrative provisions given in this ECE Regulation is that there is no restriction for such action.

Question : What would be decision of your TAA:

A) reject application as new approvals shall be done on the base of current series of amendments
B) grant an extension taking into account that the reasons are of purely administrative nature and thus have no relation to the level of requirements
C) other decision or comments (please, specify)

Decision : All countries agreed that it is no longer possible to deliver an homologation certificate according to an obsolete amendment of a Geneva Regulation. However, according to the concerned Regulation, it is possible to deliver a Declaration or a letter which may be accepted in some countries outside European Union.

7.3 Quadricycles with more than 15 kW

Question : In our country we have a problem how to treat vehicles Quadricycles L7e with more than 15 kW ? Formally these vehicles can be classified neither in category L nor in M1.

Decision : These vehicles are not within the scope of Framework Directive 2002/24/EC. There is uncertainty between Member States, which legislation is applicable. Depending on the country these vehicles are approved according to the requirements applicable for M1 vehicles, agricultural vehicles, 2-3 wheels vehicle or according to national legislation.

Some participants were of the opinion that these vehicles should be included in the Framework Directive 2002/24/EC and specific requirements should be developed.

8 countries have answered to the Norway query.

7.4. COC documents (92/61)

Directive : 92/61/EEC
Subject : COC-DOCUMENTS

Text : 92/61/EEC

Directive 2002/24/EC, CHAPTER II,
Article 21

This Directive shall not invalidate any approvals granted before 9 November 2003, nor prevent extension of such approvals under the terms of the Directive under which they were originally granted. However, as from 9 November 2004 certificates of conformity issued by the manufacturer shall comply with the model specified in Annex IV.

Question : This problem was discussed in TAAM Flensburg on July 2003. The minutes concerning this problem are attached.

Suggestion : Can new vehicles which are approved according to 92/61/EEC be registered if

1. the extension of an approval is been made **before** 9.11.2004 and the CoC-document has is of the type of 92/61/EEC
2. the extension of an approval is been made **after** 9.11.2004 and the CoC-document has is of the type of 92/61/EEC
3. the extension of an approval is been made **before** 9.11.2004 and the CoC-document has is of the type of 2002/24EC

the extension of an approval is been made **after** 9.11.2004 and the CoC-document has is of the type of 2002/24EC

Decision : A consensus on answers 3 and 4 was reached.

Annex

7.1	Extensions of directive 92/61/EC updated to 2002/24/EC (Spain 1)	<p>It was decided that according to article 21 of directive 2002/24/EC it is possible to grant extensions of such approvals that have already been in force before directive 2002/24/EC came into force. Such extensions have to be done under the terms of the directive under which they were originally granted. That means on one hand extensions are possible and includes on the other hand that the number of directive 2002/24/EC must not be mentioned in the number of the extension.</p> <p>To the additional question whether the information-document could be used in such an extension, according to directive 2002/24/EC instead of the information-document according to 92/61/EEC:</p> <p>It was pointed out that there may be a certain difficulty using the document according to the new directive in such cases where the language in which the document is written can not be understood by the reader. So it is in a formal way only in line to do an extension by using the information-document according to 92/61/EEC. But this is more a formal aspect.</p>	Extensions can be made for 92/61/EEC. The COC-paper of 2002/24/EC might be used, but problems may arise during registration due to different numbering.
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7.5. Installation of lighting and light signalling devices (93/92 Annex IV, §6.4.9.)

Directive : 93/92/EEC, ANNEX IV, PARAGRAPH 6.4.9
Subject : APPLICATION OF THE DIRECTIVE ON THE INSTALLATION OF LIGHTING AND LIGHT-SIGNALLING DEVICES ON TWO OR THREE-WHEEL MOTOR VEHICLES

Discussion : Recently a motorcycle Yamaha WR 450, vehicle category L3, has been called for periodical technical inspection. The motorcycle has been homologated in Switzerland under the EEC whole vehicle type-approval certificate No. e1*92/61*0107, Extension 02. Looking at the braking system the expert noticed the absence of any electrical stoplight switch at the front brake circuit and therefore no lighting up of the stop lamp if the front brake is operated. It seemed that the manufacturer did not foreseen such stoplight switch for this model for the front brake circuit.
The Swiss Yamaha importer confirmed that all motorcycles of this type were built in the same way e.g. without an electrical stoplight switch for the front brake circuit but only fitted for the rear brake circuit.
93/92/EEC, Annex IV, Paragraph 6.4.9 stipulates under the title 'Stop lamps': "Electrical connections: must light up whenever at least one of the service brakes is applied."
In our opinion this wording states that in any case the stop lamp(s) has (have) to light up whenever a service brake is applied (front brake only or rear brake only or - of course - both of them).

Question : **1.** How is your interpretation of par. 6.4.9 for fullfilling the lighting up condition? Are you of the opinion that:
A) only one of the service brakes (either the front brake OR the rear brake) has to be equipped with an electrical stoplight switch;
B) all service brakes (the front brake AND the rear brake) have to be equipped with electrical stoplight switches.
2. In case of answer 1B only: How would you proceed with the existing vehicles already put into traffic equipped with just one stoplight switch for the rear brake? Would you:
A) start a recall for a refitting of all front brakes with an electrical stoplight switch (on the expenses of the Swiss importer of this vehicles);
B) renounce to refit the motorcycles already put into traffic but making sure by the Swiss importer that all newly sold vehicles are equipped on each service brake with an electrical stoplight switch (front and rear).

Decision : All delegates agreed that all service brakes (the front brake AND the rear brake) have to be equipped with electrical stoplight switches.

7.6. Installation of lighting and light signalling devices (ECE Reg. 53 and 48)

Directive : ECE R53 AND R48.
Subject : LAMPS DEEMED NOT TO BE PRESENT ACCORDING TO R48, A MISSING PARAGRAPH IN THE R53.

Text : **ECE R48, paragraph 5, General specifications:**
5.22. With the exception of retro-reflectors, a lamp even bearing an approval mark is deemed not to be present when it cannot be made to operate by the sole installation of a filament lamp.

ECE R53

There is no equivalent paragraph in this Regulation.

Question : Can paragraph 5.22. of the R48 be considered acceptable for R53 (L-class) vehicles even if the corresponding paragraph does not exist in the R53?

Suggestion : Yes, this is acceptable. The RDW will take the necessary steps to have the R53 amended accordingly.

Decision : Everybody agreed that paragraph 5.22. of the R48 can be considered as acceptable for R53 (L-class) vehicles. This amendment will be forwarded by Netherlands.

7.7. Postponement of Euro 3 (97/24-2002/51)

Directive : 97/24/EEC - 2002/51/EC
Subject : POSTPONEMENT OF EURO-3 EMISSION FOR TWO- AND THREE-WHEEL MOTOR VEHICLES.

Text : **2002/51/EC, Article 3**
 2. With effect from 1 January 2007, Member States shall:
 (a) consider certificates of conformity which accompany new vehicles pursuant to Directive 92/61/EEC as no longer valid, and
 (b) refuse the registration, sale or entry into service of new vehicles which are not accompanied by a certificate of conformity in accordance with Directive 92/61/EEC, on grounds relating to the measures to be taken against air pollution, if the vehicles fail to comply with the provisions of Directive 97/24/EC.

For the type I test, the limit values set out in rows B of the Table in Chapter 5, Annex II, Section 2.2.1.1.5 to Directive 97/24/EC shall be used.

For vehicle types of which no more than 5 000 units are sold annually in the European Union, the date shall be 1 January 2008.

Question : Article 3 introduces a one-year postponement from the requirements of emission Euro-3 for small volume vehicles.

We have the following questions:

- What is meant by annually? See the following table. For which vehicles is this rule applicable?

vehicle type	2004	2005	2006	2007	2008	applicable?
A	4000	4000	4000	4000	4000	
B	4000	4000	4000	4000	8000	
C	-	8000	8000	3000	3000	
D	10000	3000	3000	3000	3000	
E	2000	2000	2000	6000	4000	
F	2000	2000	2000	6000	6000	
G	8000	8000	8000	8000	3000	

- Who has to provide the TAA with these figures?
- Who has to check the provided sales figures?
- How are the provided sales figures checked?
- What about vehicles that are exported (by dealers) from the EU without the knowledge of the manufacturer?

Suggestion : We would like to know the opinion of the other TAAM participants concerning the use of this postponement rule.

Directive : 97/24/EC AS AMENDED BY 2002/51/EC
Subject : EURO 3 DEROGATION FOR <5000 UNITS/YEAR

Question : The emission Separate Directive Row B limits enter into force from 1/1/2007 for all registrations. Derogation is foreseen for low volume vehicles: “For vehicle types of which no more than 5000 units are sold annually in the European Union, the date shall be 1 January 2008”

The text of the derogation needs clarification:

1. It is not clear whether the limit “5000 units sold annually” refers to sales numbers of the year 2007 only, or whether this is a general rule that needs to be respected the year[s] before.
2. A definition of “sold” is required, the definition should exclude stock carried over from 2006, but sold in 2007.
3. A harmonised procedure on the control method needs to be agreed:
 - o Sales numbers are difficult to control in the whole European Union.
 - o Some MS may control compliance by a national code n° linked to the level of emission

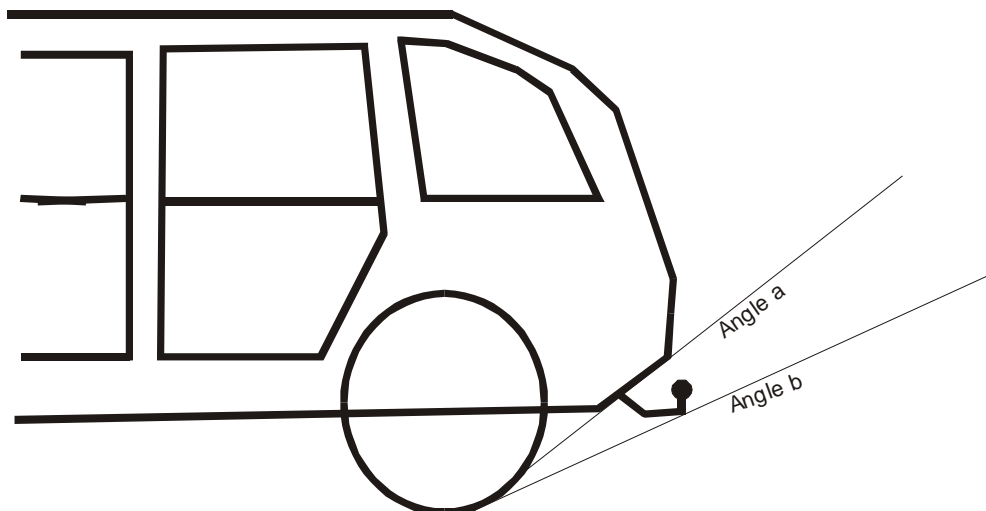
Suggestion :
 1. The limit of 5000 vehicles concerns the vehicles of one type sold in the EU *in the year 2007*
 2. Sold means the *initial action of making a vehicle available* for the first time on the Community market, with a view to use and register in the Community. (In analogy with New Approach guideline “blue book”)
 3. *Manufacturer’s attestation* for the maximum number of vehicles, and attestation circulated via TAA to all MS as addition to the WVTA

Decision : It is proposed to agree with the selling forecasts for 2006 and 2007 given by the manufacturers, but the plain agreement is not obtained.

7.8. Characteristics of braking devices in quadricycles (93/14 and 2002/24)

Directive : 2001/116 EC ADAPTING TO TECHNICAL PROGRESS 70/156 EC

Text :



Question : According to the “OFF-ROAD VEHICLE (symbol G)” definition in Annex II, is needed to measure the departure angle. If the vehicle is approved according to 94/20, should that angle be measured considering the coupling device?

Suggestion : **A** - Yes, it should be measured considering the coupling (Angle b).
B - No, it should not be measured considering the coupling (Angle a)

Decision : The delegates agreed to answer negatively to the question.

8. FRAMEWORK DIRECTIVE 74/150/EEC (AGRICULTURAL AND FORESTRY TRACTORS)

8.1. Agricultural tractors T1 and T3

<i>Question</i>	: How to treat Agricultural tractors (T1-T3) without EC Type Approval ? In our opinion such new tractors should be EC type-approved.
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<i>Decision</i>	: 2003/97 allows delivering national type approvals until July 2004.
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9. MISCELLANEOUS

9.1. 2002/24: 2-3 wheels emissions

The validity of the homologation of the vehicle in the case of modification of the vehicle (e.g. change of the muffler) is depending on the laws in the country where the vehicle is registered; so no conclusion can be reached on that subject.

9.2. ETAES report

ETAES met on Monday afternoon to exchange the experiences after three months of functioning. The pilot project should last two years.

Some countries participating to the experiment (France, Germany Luxembourg Netherlands Spain United Kingdom, and Norway) agreed to send also the files on agricultural and 2-3 wheels vehicles.

It has been decided to open reading rights to countries which would like to have access to that data bank, the consequence being that Member States getting this reading rights will not receive any more the paper files: Austria, Hungary, Finland, Estonia, Ireland, Latvia, Norway, Poland, Slovenia, Switzerland and Turkey volunteered to get reading rights; these countries have to contact KBA for more information..

9.3 Noise measurements in China

VCA asked whether somebody knew the existence of ISO noise tracks in China.

9.4. Homologation information distribution

It is requested to update regularly the list of people in charge of the distribution of the informations about homologations.

10. NEXT MEETING

Spain kindly proposed to host the subsequent meeting in Q1/Q2 2005