Informal Document No. **GRRF-65-34** (65th GRRF, 2-6 February 2009 agenda item 6)

Amendments to Regulation 90

Document: GRRF-65-07

1. The issue under discussion

The amendments to Regulation 90 to add discs and drums arises out of problems in the aftermarket for cars and trucks.

IMMA was asked to investigate whether these problems also occur in the aftermarket for the L-category vehicles, and therefore whether these vehicles should be included in the amendments.

2. Result of IMMA investigations

The volumes in the L-category market are too small for replacements discs and drums to be commercially attractive to aftermarket manufacturers. There are some aftermarket parts but they tend to be for specialist racing applications. There are no reports of substandard aftermarket parts.

Unlike the car industry, manufacturers only sell OE replacement parts meeting the original type approval to Regulation 78, under their own brand label. No manufacturer sells his replacement parts under another brand name.

Not all replacement discs or drums are marked in a manner that would meet the "replacement code" specification. The replacement parts are distributed through the manufacturer's own network in sealed packages with the necessary information indicated on the outside. The system works well and manufacturers see no need to incur additional costs by changing it.

IMMA's conclusion is that for the time being it is not necessary to include the replacement discs and drums for the L-category in Regulation 90. These parts are properly covered by Regulation 78 approvals.

The text of the amendment has therefore to be amended so that it does not apply to the L-category.

Dr NM Rogers