

Proposal for amendments to document GRPE-66-37 by the Russian Federation

(ref. draft new Regulation on recyclability of motor vehicles)

I. Proposal

1. Add the following new paragraphs to Annex 1:

Paragraph 10.

For the purposes ~~purpose~~ **purpose** of identification ~~of~~ components in the recycling process, ~~the~~ manufacturer declares ~~about~~ **that processes to comply with the** labeling of plastic components in accordance with paragraph 3.3 of Annex 5, and about labeling of rubber components in accordance with paragraph 3.4 of Annex 5 **apply to this vehicle type**.

Paragraph 11.

For the purposes of informing about **materials and substances used** ~~using~~ in the vehicle construction ~~lead, mercury, cadmium, and hexavalent chromium~~ **the** manufacturer declares **that processes to comply with the materials and substances restrictions apply to this vehicle type** ~~their existence in the components of vehicle~~.

~~2. Annex 5, Paragraph 3.2. amend to read:~~

~~The manufacturer shall provide the competent authority with all necessary information in the form of documents. In particular, appropriately in the form of a document should be drawn up: information about recycling and recovery of materials; manufacturer's declaration with the list of components containing lead, mercury, cadmium and hexavalent chromium; manufacturer's declaration about labeling of plastic and rubber components used in the vehicle construction.~~

Instead of amending paragraph 3.2, OICA proposes to amend paragraph 3.5, as follows:

2. Annex 5, Paragraph 3.5. amend to read:

3.5. “The vehicle manufacturer shall be required to demonstrate that, through contractual arrangements with his suppliers, management of material and substance restrictions **for not allowed applications of lead, mercury, cadmium, hexavalent chromium** is ensured.”

II. Justification

Amendments to paragraphs 10 and 11 are mainly editorial.

The proposed amendments by the Russian Federation to paragraph 3.2 in Annex 5 would involve a substantial administrative burden so OICA believes that the contractual arrangements with suppliers fully covers the restrictions on materials and substances. However, OICA proposes to amend annex 5, paragraph 3.5 to mention the four restricted substances.
