

Review of Supplements to UN Regulations under GRs

At the March 2018 session of WP.29 (see ECE/TRANS/WP.29/1137, Paragraphs 62 to 70), OICA and IMMA pointed out that the revised General Guidelines for United Nations regulatory procedures and transitional provisions in UN Regulations (ECE/TRANS/WP.29/2017/107 as amended) create a retroactive change in the process of granting extensions to existing type approval. This is caused by the mandatory application of all supplements to UN Regulations in force to extensions of previously granted approvals (i.e. before these Supplements existed!). OICA therefore asked for a suspension of the application of the related part, paragraph 31, of the General Guidelines.

After a detailed discussion, WP.29 recognized that some supplements would imply technical changes to existing vehicle types, such as those identified by the representatives of OICA and IMMA in WP.29-174-03 and WP.29-174-20. Pending further in-depth discussion, WP.29 reflected whether or not approval authorities should apply those supplements in the case of extensions to existing type approvals. WP.29 also noted the need to take into serious consideration a possible amendment of the Guidelines and therefore, the Chair invited contracting parties to prepare for discussions on a possible amendment of the general guidelines in June 2018. WP.29 also asked OICA to present a detailed list of Supplements that introduce new technical requirements which could make extensions of previously granted approvals impossible for technical reasons.

The list below is the result of the study by OICA manufacturers' experts:

UN Regulations and Series	Status of Document	EIF	Adopted Document
R14.07	Supplement 02	13.04.2012	WP.29/2011/54 + para.49 of report
R16.06	Supplement 08	22.06.2017	WP.29/2016/98 + para.75 of report
R43.01	Supplement 01	18/11/2012	WP.29/2012/21
	Supplement 04	08.10.2015	WP.29/2015/11
	Supplement 05	10.10.2017	WP.29/2017/12
	Supplement 06	19.07.2018	WP.29/2017/111
R48.04	Supplement 03	24/10/2009	WP.29/2009/22 + para.56 of report
	Supplement 05	09/12/2010	WP.29/2010/22
R55.01	Supplement 05	08/10/2016	WP.29/2016/06 + para.58 of report
	Supplement 07	10/02/2018	WP.29/2017/69
R83.06	Supplement 07	09/02/2017	WP.29/2016/42
R83.07	Supplement 03	09/02/2017	WP.29/2016/43
R107.06	Supplement 07	15/11/2018	WP.29/2018/19
R107.07	Supplement 02	15/11/2018	WP.29/2018/20
R116	Supplement 05	18/06/2016	WP.29/2015/91
R121.01	Supplement 02	[19/07/2018]	WP.29/2017/116 + Corrigendum 1

As a consequence, extensions of type approvals under the following series of amendments would still need to be granted according to the rules of Revision 2 of the 1958 Agreement as defined in paragraph 31. (a) of the the new General Guidelines:

- R14.07
- R16.06
- R43.01
- R48.04
- R55.01
- R83.06
- R83.07
- R107.06
- R107.07
- R116
- R121.01

Justification

1. R14.07 – Supplement 2: Anchorages located within the top tether zone to be marked or tested according to top tether provisions.

One vehicle model has already been identified needing modification at the rear outboard seats (additional marking/labels) in case Supplement 2 is applied when extending previously granted approvals: this would be burdensome from a technical and logistic point of view, without safety benefit.

2. R16.06 – Supplement 8: Modification of the universal belt test fixture (lap belt angles and contact)

Three vehicle models have already been identified that would need substantial modifications (positioning of the belt buckle and its stalk) in case Supplement 8 were to be applied to previously granted approvals. This would be very problematic technically, without clear safety benefit.

3. R43.01 – Supplement 01: Harmonizes the burning rates for safety-glass panes faced with plastics material and glass-plastics safety panes with those for rigid plastic glazing, flexible plastic glazing and rigid plastic double glazed units.

4. R43.01 – Supplement 04: Opens the regulation to the approval of plastic windscreens and modifies the provisions for laminated plastic panes other than windscreens.

5. R43.01 - Supplements 05: Alignment of the requirements for plastic panes other than windscreens, on those of plastic panes windscreens, amended pass/fail criteria (e.g. 100% success among the samples)

The vehicles would need complying with increased severity on some aspects (new immersion test, passa/fail criteria, abrasion resistance)

6. R43.01 – Supplements 06: Among others: adds accurate requirements for the abrasion test machine, clarifies the lateral limits of any opaque obscuration in the toll automatic payment sensor area.

The vehicles would need complying with the updated abrasion machine

7. R48.04 – Supplement 03: Introduction of new requirements for voltage control (OVIG).

For vehicles type approved before this Supplement 03, the voltage at the lamps was 12V and not controlled. From this Supplement, it is required to operate the voltage at 13.5V and to control it. Such vehicles would therefore need substantial modifications if Supplement 03 were to be applied when extending previously granted approvals. No real safety issue.

8. R48.04 – Supplement 05: Introduces provisions for interdependent lamp systems. New definitions included. New requirements added for the apparent surface, geometric visibility requirements and provisions for lamps installed on moveable components.

If Supplement 05 is applicable to vehicles type approved before, it has some impact on the design of rear lamps on certain vehicles (passenger cars only). Such vehicles would therefore need substantial modifications if Supplement 05 were to be applied when extending previously granted approvals. No real safety issue.

9. R55.01 – Supplement 05: restricts the definition of Class S couplings, such that some special innovative couplings cannot be covered anymore by the regulation.

The supplement 05 reduces the scope of the regulation such that some special couplings cannot be covered anymore by the regulation

10. R55.01 – Supplement 07: Separates the procedures to verify towable mass from those of certifying performance values, adds procedures to verify towable mass for vehicle combinations, adds integrated fixing points for secondary couplings, clarifies the procedure to identify worst cases for certification testing.

11. R83.06 – Supplement 07: and R83.07 Supplement 03: correct calculation for coast down shall be made by averaging the uphill and downhill resistance forces instead of average of times.

These modifications were related to the modalities for performing coast down test, and were in principle only a correction of a wrong concept. But they could impact on the existing homologations previously obtained on the basis of the text into force before the implementation of above supplements, if type approval authorities should impose the repetition of some homologation activities (notably the Type 1 test) to grant extensions.

12. R107.06 – Supplement 07 and R107.07 – Supplement 02: Introduce new provisions on "double insulation" and "reinforced insulation" in trolleybuses.

13. R116 – Supplement 05: Removes from paragraph 7.3.9.1. the optical signal for activation/deactivation of the immobiliser in order to place it into UN-R 48; (Based on Annex III of the GRSG-108 report - sheet 21).

The Supplement 05 reduces the scope of the regulation such that the immobilizer optical signal is removed from the scope. The question then is: "how getting an extension for a vehicle approved to a previous supplement, and fitted with the immobilizer optical signal, if the UN R48 is not aligned?"

14. R121.01 – Supplement 02: introduction of the eCall symbol and alignment of the safety belt reminder provisions on those of UN R16.

The vehicles would need to change the Ecall (AECS) symbol.