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World Forum for Harmonization of Vehicle Regulations (WP.29)

Working Party on Pollution and Energy (GRPE) (Forty-sixth session, 19-23 May 2003, agenda item 5.1.)

PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 83 (Emissions of M₁ and N₁ categories of vehicles)

<u>Transmitted by the expert from the</u> International Organization of Motor Vehicle Manufacturers (OICA)

<u>Note</u>: The text reproduced below was prepared by the expert from OICA in order to propose the deletion of the ECE approval marking, following the suggestion made during the one-hundred-and-twenty-seventh session of WP.29 to consider its acceptability at the respective Working Party (TRANS/WP.29/861, para. 132). The proposal is based on a document distributed without a symbol (informal document No. 8) during the forty-fifth session of GRPE (TRANS/WP.29/GRPE/45, para. 30). The suggested amendments to the Regulation are marked in **bold** characters.

Note: This document is distributed to the Experts on Pollution and Energy only.

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A. PROPOSAL

<u>Contents</u>, list of annexes, amend to read (the secretariat suggests to reserve annex 3 for eventual later purposes in order to avoid renumbering of the subsequent annexes and appendices; i.e. the text of the annex should be deleted, but the title of "Annex 3" still remains).

"Annex 3: (Reserved)"

Text of the Regulation,

Paragraphs 4.3. and 4.3.1., amend to read:

- "4.3. Notice of approval or of extension or of refusal of approval **or production definitely discontinued** of a vehicle type pursuant to this Regulation shall be communicated to the Parties to the Agreement which apply this Regulation, by means of a form conforming to the model in annex 2 to this Regulation. **This form shall contain in its heading:**
- 4.3.1. a circle surrounding the letter "E" followed by the distinguishing number of the country which has granted the approval; 2/"

<u>Insert new paragraph 4.3.2.</u>, to read:

"4.3.2. the approval number, as prescribed in paragraph 4.2. above."

<u>Paragraphs 4.4. to 4.8.</u>, should be deleted (however, preserving footnote <u>2</u>/).

Annex 2,

Item 18., should be deleted.

Items 19. to 21., renumber as items 18. to 20.

Annex 3, amend to read:

"Annex 3

(Reserved)

(The previous content of this Annex dealing with ARRANGEMENT OF APPROVAL MARK has been made obsolete.) "

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B. JUSTIFICATION

The one-hundred-and-twenty-seventh session of WP.29, held in June 2002, resumed discussions on OICA informal document No. 15, originally submitted to the March 2002 WP.29 session.

Basically, this OICA proposal aimed at triggering discussions on the possibility to delete, in the various Regulations, the current system approval marking requirements. The text of this informal document No. 15 is reproduced in item C. below.

WP.29, after reviewing the OICA suggestion, concluded by asking OICA to prepare a concrete example for review by the appropriate Working Party, in order to test the acceptability of the proposal, so that the necessary amendments to other Regulations can be undertaken.

The above proposal responds to WP.29's request and is submitted for the consideration of GRSP.

C. INFORMAL DOCUMENT No. 15 SUBMITTED BY OICA TO WP.29 AT ITS ONE-HUNDRED-AND-TWENTY-SIXTH SESSION

I. The situation

Current ECE Regulations under the 1958 Agreement usually require an approval marking, allowing identification of the country having granted approval, the applicable version of the Regulation (e.g. series of amendments) and the approval number.

Such marking requirements apply to systems, components and technical units.

This OICA paper only addresses system marking.

II. Background of system approval marking in ECE Regulations

The current requirements for system approval marking were introduced in the early stages of the 1958 Agreement framework, with the aim of allowing quick and easy identification of approved types and of the applicable ECE Regulation.

Clearly, such marking requirements were established at a time when the paper documentation process, without copy machines and, last but not least, without modern information technology, was unreliable, burdensome and time-consuming.

III. The problems of system approval marking

While system approval marking had a certain use in the past for easy identification, the situation of today has changed:

 System approval marking generally does not provide any added value to either customers, technical services or authorities. Some exceptions are obviously possible, such as the ECE Regulation No. 24 (diesel smoke) marking requirements.

- System approval marking is a burdensome process, duplicating other modern identification means.
- With current and modern information technology, authorities and technical services can easily check vehicle approval numbers, with all necessary documentation readily available. The system approval number on the vehicle itself is superfluous.

Several countries, applying a type approval or certification system, do not require system approval marking in their national regulations.