

**REPORT of the 1st MEETING of the INFORMAL PASSENGER CAR GTR WORKING GROUP
taking place at the UN ECE in Geneva on 9th and 10th October 2003.**

The proposed agenda along with Terms of Reference and the Proposed Approach to the Task had been circulated with the invitations to the meeting as Docs. GTR 2003/1/2/3 and good attendance was achieved. This is listed as Doc. PCGTR 2003/7.

During the introduction given by Chairman Ian Yarnold, it was announced that AC3/WP29 had given the authority for the Group to consider a GTR on Passenger Car Braking. Mr. G Soodoo of NHTSA had agreed to be the joint Chairman although it was accepted that to provide a consistent approach Mr. Yarnold would normally chair the meetings.

Having considered the Terms of Ref. Mr. Ng of Transports Canada questioned the time-scale of 2006 as being too ambitious given only 2 meetings of 2 day duration per year. VDA compared the earlier harmonization efforts which had needed 15 meetings held in many different locations. It was made clear that AC3 would need to see a reasonable time-scale in our proposal submission.

Meeting days linked to GRRF meetings makes obvious sense in reducing travelling time and costs particularly for delegates from USA, Canada and Japan. However, given the tendency for GRRF meetings to spread to almost a whole week, some alternative plan was needed.

Mr. Soodoo said he had tried to persuade American Alliance (Industry) delegates to attend the meetings but they were being stopped by the distance, a situation which might be different if the meeting was to be held in Washington

It was decided to hold a 2-day meeting associated with the GRRF but separated by a weekend. In Feb.2004, the GTR meeting will follow the GRRF but will take place at the OICA offices in Paris on Mon/Tue Feb. 9th/10th, commencing at 10am.

There was some call to report to the GRRF after the meetings but it was deemed acceptable to report after the 1st meeting and indicate the agenda and provisions for the following meeting. In February it is hoped that we will have an outline of the justification case prepared for the GTR.

In terms of communication procedures, all documents shall be sent to the Secretary (malcolm.brearley-contr@trw.com) who will, given co-operation by contributors, make every effort to provide documents for a meeting 2 weeks in advance.

Scope of the GTR.

Lengthy discussion took place on this topic. Initially it was assumed that the scope would include **Passenger Cars** as in **Category 1-1** (reference TRANS/WP.29/GRSG/2003/10/Rev.1). However, this definition faced the following 2 problems:

- 1) European M1 vehicles are limited not in weight but in passenger carrying capacity.
- 2) US allows a wider vehicle range than conventional passenger cars (trucks, vans, pick-ups, MPV's and SUV's) but with a gross vehicle weight limit of 3500kg.

Japan could only accept M1 passenger cars because, like Europe, their categories differentiate between car/MPV's and vans/light trucks. Since the latter are classed as N1 vehicles they believed these should be excluded from this GTR.

Japan expressed a difficulty dealing with vehicles under 2 categories if N1's were included in the GTR.

It was suggested that the scope might be modified to 'Light vehicles less than 3500kg' and allow light trucks and pick-ups to be included. This might be acceptable to Europe and the weight limit was

welcomed by NHTSA but Japan could not agree to the Scope expressed in this way but did not object to the weight limit.

US asked if the Scope could be expanded to include their 'non-conventional' passenger vehicles if required by National interpretation. In the USA 49% of vehicles certified to FMVSS 135 are passenger cars and 51% are SUVs, Pick-ups, mini-vans and cargo vans all below 3500 kg.

It was suggested that the GTR Priority List placed passenger cars in a high position because the 13-H – 135 harmonization work already completed made a GTR readily achievable even if the vehicles covered by 135 were included by general consent.

OICA believed the AC3 mandate was for passenger cars but the formal definition laid down in Annex 2 of Doc.TransWP29/GRSG/2003/10rev1 is not irrevocably fixed and binding, so that any party could widen the scope if they wished to pursue the matter.

The outcome of this was that the GTR Scope would probably be 'Passenger Vehicles up to 3500kg GVW'. Mr. Soodoo would check which American vehicles would be excluded by a strict interpretation and whether an extension should be requested for USA.

The Secretary presented GTR doc. 2003/4 which set out the GTR Development Guidelines as summarised from TRANS/WP29/883/884 and the format recommended for GTR-Braking which were discussed under guidance from the Chair.

Whilst accepting that other current braking regulations have to be examined, the primary contenders were seen as R.13-H and 135. GTR2003/4 also examined the different philosophies represented by Reg.13-H and FMVSS 135 and presented a critical review at some aspects of the current Regulations.

A comparison was made to show the points of agreement along with clear and minor disagreement between these 'harmonised' sets of rules.

The problem of providing a text which can be a suitable technical requirement for application to braking under Type Approval and Self Certification control regimes was highlighted even though the GTR does not deal directly with the certification process.

Proposals for possible structures of a GTR were presented and the essentials of several options were listed and explained.

Also those decisions, which lie immediately ahead and have to be faced before the detail can be considered, were tabled in the final section of GTRdoc.2003/4.

The issues raised in the presentation were then discussed.

US saw the most urgent tasks as agreeing a compatible structure and considering all the likely contenders in the 'compendium'.

The Chair saw an equal need to draw up a justification and assess the cost benefits which would mean the inclusion of a statement on the difficulties being encountered when operating with the current provisions.

Japan agreed with these approaches but see an urgent need to deal with the Type Approval - Self Certification issues. They thought one approach would be to put effort into common areas but other delegates believed it preferable to form a plan around an agreed structure and to deal with the details later.

Mr. Kloos (DC) pointed to the absence of India and China who were manufacturing countries and together represented an enormous potential market.

UK said that AC3 had asked the GRRF to take on the GTR Braking work in the knowledge of incomplete global representation. It was realised that large markets might be involved but this ad-hoc Group should be concerned primarily with Nations which are making a contribution.

Developing countries, as mentioned at the GRRF, may be interested in a reduced level of the requirements that are under consideration for the GTR.

Cost Effectiveness issues were addressed and, in the preamble, it may be necessary to give an overview of advantages that a GTR might bring and an assessment of the costs and time-scales which might be reduced.

Guidance might be sought informally from AC3 and their recommendations in this area would be followed.

Some delegates posed questions concerning the inclusion of technical requirements in the GTR. For example should ABS requirements be excluded and would new technologies such as EHB and Electro-mechanical Braking need to be included. These discussions were considered not to be appropriate at this point of the development of the GTR.

US supplied one view on this topic by asking that the GTR be kept as simple as possible by letting manufacturers take responsibility for new technology functions and concentrating instead on the core performance requirements.

US further considered that Reg.13-H, if adopted, would have to become a FMVSS document and the meeting wondered what this would mean in addition to having a Federal Layout and deal with precisely specified and easily repeatable tests. (There would, of course, be no such concept as 'in agreement with the Technical Service'!)

The comparison document suggested earlier by Japan, was recognised as being comprehensive and available for eventual use, but US and the Secretary had looked at this source document and prepared other comparisons which were not so lengthy. Mr. Soodoo of NHTSA, considered putting effort into the easier tasks of agreeing details but this view was not shared by many other delegates and the philosophy, concept and structure were thought to be the primary objectives.

Any simplification which could be achieved would be a clear advantage.

Mr. Gaupp said that previous harmonisation had failed to be maintained because R.13-H and 135 had moved apart as local considerations and advances had taken precedence. This would imply that a GTR, once developed, should only be amended by a single body.

The Chair saw the GTR as a set of Technical Requirements and the means of obtaining approval would be a local consideration. He wanted the next meeting to agree the submission document.

For the **second day of the meeting**, the agenda was set out as:

- 1) Statement by different regions on their positions regarding the GTR.
- 2) Selection of vehicles within the scope of the GTR.
- 3) Objective of the Group
- 4) Work Plan

US declared that they were committed to this GTR and believe it to be a reachable target since they want it to work and are prepared to compromise in order to achieve it.

US Standards are concerned with safety and Mr. Soodoo pleaded special conditions since their market for vehicles covered by FMVSS 135 is unusual in the mix of large numbers of light trucks and pick-ups, SUV's and MPV's in addition to conventional cars. Their Government recognises that Regulations have to enjoy a level of Industry approval resulting from them being consulted in the formulation.

Clear benefits have to be weighed against the cost of implementation.

Mr. Soodoo answered the question posed in document 2003/4 as to why the US had not signed up to Reg.13-H, by reminding us that US is not a signatory to the '58 Agreement. FMVSS 135 was the result of previous efforts to achieve harmonization with Reg.13-H and in Sept. 2002 became mandatory for vehicles under 3500 kg. On the other hand, he observed that there was no European mandatory requirement for passenger vehicles to be approved under Reg.13-H, a Regulation which, in USA, was perceived as being more demanding than Reg.13

In Europe, Regs.13 and 13-H are considered directly equivalent, therefore some VM's are gaining approvals to Reg.13-H so as to give access to Japanese and Australian markets.

NL drew attention to the many countries which list Reg.13 or 13-H as alternatives whereas only USA and Canada stand out for Federal Rules. If it is necessary that Congress would have to approve any new Standard, this could prove to be a sizeable obstacle and one solution would be to take Reg.13-H as the GTR document. This did not define the European position however, but might be taken as a pointer to some European feelings.

The Chair confirmed that this Group can only work toward producing a Technical Report to senior administrators and legislators as their part in producing a joint Technical Standard.

Japan gave their position as signatories, in 1998, to the '58 Agreement and indeed have adopted Reg.13-H as their National Passenger Car braking Standard. The transitional provisions will expire in Jan. 04 and they would like to see Reg.13-H made mandatory for passenger cars in Europe. Japan confirmed that on final agreement of the GTR it would be applied as their passenger car Standard. The UK agreed that it was confusing to have Directive 71/320/EEC, UN ECE Regulation 13 and UN ECE Regulation 13-H all acceptable within Europe. It was suggested that steps should be taken to remove Category M₁ from the scope of Regulation 13 and that Regulation 13-H should become the sole standard for European Whole Vehicle Type Approval.

Categories in the Scope.

Having reflected on what was said on the first day discussions, the Chair suggested that the **Scope could be maintained as the Passenger Vehicle GTR but that the 3500 kg limit would be a useful addition.**

This prompted another round of discussion on whether this suggestion should stand and the Chair made the following 2 observations:

- 1) If popular opinion among delegates differed, AC3 could be petitioned to adjust the Scope and if convinced, WP29 would have the final decision.
- 2) Each contracting party or region could expand the Scope of the Regulation on a National or Regional basis should they see it to be necessary.

Some European delegates could see a value in an extended scope which might bring N1 vehicle braking standards up to M1 but wondered what the procedure would be for achieving this Nationally. CLEPA said that whilst the categories of the vehicles were wide, some Regulations bypass the normal categories and the scope could be for a specified range of vehicles.

US would be grateful for a level of flexibility in the Scope and wanted wording to be such as to include all vehicles currently covered by FMVSS 135.

Canada asked if contracting parties are forced to accept the GTR and was told that acceptance is optional. They said that vehicles included in a category are defined locally and Japan could restrict the GTR to Passenger Cars if they wished.

Mr. Hesse, with support from several other European delegates, sympathised with the USA position. From a safety point of view vehicles which have a similar weight and speed capability should be expected to have similar brake performance.

Japan repeated their earlier position and counter-suggested that the Scope should be as proposed by AC3. US and Canada could extend the Scope nationally to meet their wider requirements. Reg.13-H, currently accepted for passenger cars, might give way to the GTR but Reg.13 will exist for other vehicles.

The chair summarised the discussion and proposed that the **Passenger Vehicle** scope would stand but with a maximum mass of 3500 kg.

Mr. Gaupp saw this as a technical restriction ruling out trucks and pick-ups even if they had M1 braking Standards and thought that the old established category definitions might now need redefining.

US said that the exclusion of large numbers of vehicles clearly would have a serious affect in USA and would take this limitation back to DoT to see if the GTR would still be of interest.

Mr. Gaupp wanted the Passenger Car definition revisited and US suggested that some vehicles being designed would have more than 9 seats in total which again would cause a problem in GTR Scope. The Chair confirmed that the EU may not accept more than 8 seats plus the driver for passenger cars. He felt that the group needed to make progress and proposed that as a first step he should seek clearance from AC3 for definition of the scope of the GTR.

Objective of the Group.

To develop a Technical Regulation specifying Braking System requirements applicable to Passenger Vehicles (≤ 3500 kg GVW), harmonized for application at Global, Regional or National level, irrespective of the administrative or legislative process in operation.

Assignments.

Contenders. Japan will lead and Mr. Ishihara from Nissan will try and add some details to the study which was circulated as GTR2003/5. Help from any other delegates who have access to an overview of specific national requirements should please send these to the Secretary who will collect and integrate these with the information from Japan. (Note: This should not include a direct comparison of individual paragraphs in different documents.)

Cost /Benefits. OICA will lead this investigation helped by contributions from CLEPA and any Vehicle Manufacturers who can supply cost and benefits analysis.

Form of GTR. US will lead the consideration of what the GTR could be like and how the size can be made reasonable. This should consider how the layout alternatives might be combined.

Problem Solving. UK will consider the contentious issues that have been exposed and attempt to form a view of the route forward.

Mr. Gaupp stressed that the constructional requirements are an important part of the Regulations so abbreviation should proceed carefully as many political questions are involved.

Mr. Hesse suggested that US should say what parts of R.13-H they could accept so that the Group could attempt to suitably modify this Reg. to achieve acceptance by the US, or the task should be reconsidered.

The Chair concluded by asking US to consider what changes would need to be made to R.13-H for this to be acceptable to them.

The Secretary announced that the UN ECE Secretariat had agreed to provide a web page under the GRRF section for PCGTR working documents. The group was grateful for this facility but was conscious not to overload Mr. Ramos with documents. It was agreed to send all documents via the GTR Secretary.

M Brearley 14.10.03