



**GRUPE DE TRAVAIL “BRUXELLES 1952”
WORKING PARTY “BRUSSELS 1952”**

1958 Agreement – Regulations concerning lighting and light-signalling devices

Requirements regarding approval markings

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A. BACKGROUND

1. At its 131st session WP.29 considered proposals transmitted by GRPE which are intended to delete the requirements regarding approval markings from Regulations No.s 83 and 101. In the discussion, the representatives of Japan and the Russian Federation noted the importance of the approval mark and expressed concern that the deletion of such requirements would be inconsistent with the Agreement. WP.29 expressed its preference to keep the status quo, but invited the representatives from OICA and GTB to present to WP.29 a new proposal for an improved or alternative solution, for consideration at its March 2004 session (TRANS/WP.29/953 par. 75).

The position of GTB, as set out below, refers to Regulations concerning lighting and light-signalling devices.

2. Article 1 par. 2, Article 2 and Article 4 of the Agreement refer to approval markings which are granted by the Contracting Parties and described in a Regulation. The Agreement does not specify the structure and content of the approval markings; Contracting Parties are free to decide on these elements for each individual Regulation.

In the Regulations concerning lighting and light-signalling devices, the presence of markings is required as follows:

- a) The trade name or mark of the applicant
- b) Indications regarding the light source
- c) An approval marking consisting of a circle surrounding the letter “E” followed by the distinguishing number of the country which has granted approval, and the approval number; its first two digits indicate the most recent series of amendments, the remainder is assigned by the competent approval authority
- d) Additional symbols which refer to the technical substance of the individual Regulation, such as
 - for headlamps: the beam pattern (driving/passing); the direction of traffic; the class of beam (A, B, C); the lens being of plastic material; the maximum luminous intensity of the driving beam
 - for lighting/signalling devices: the kind of device; the class or category; the mounting; the activation with other devices (“/” for front fog lamps)

3. The presence of the approval marking is considered to be useful or even necessary mainly for two reasons:

- 1) It is proof, in the legal sense, that the product in question has been approved in the context of the 1958 Agreement. Attention is drawn to item 4.2. and 4.3. of the Consolidated Resolution on the Construction of Vehicles (TRANS/WP.29/78/Rev.1)
- 2) It can help to identify the origin of devices on vehicles in service and of those offered for sale as replacement or aftermarket parts

The presence of the trade name or mark of the applicant can also be used to identify the origin of devices. The additional symbols may help to verify whether a device belongs to the vehicle it is installed on and/or whether it is mounted correctly

4. During the discussion on harmonized beam patterns in GRE and on Adaptive Frontlighting Systems (AFS) in the GRE Informal Group it has become evident that the present system of markings for headlamps is complex and difficult to apply, even for experts familiar with the subject. It has also been mentioned that the marking system for other lighting and light-signalling devices has certain drawbacks. One example is the indication of the series of amendments for those Regulations which cover several kinds of devices, such as Regulation No. 7. A change of requirements which implies a new series of amendments for one kind of device may have consequences for the marking of other devices which are not affected by the change.

5. For a number of lighting and light-signalling devices, Regulations No.s 48, 53 and 74 concerning installation refer to symbols indicated in the individual Regulations for such devices, although these installation Regulations do not require that the devices covered must be approved to UN/ECE Regulations. The respective paragraphs are set out below.

Regulation No. 48

2.16.1.	Single lamp	type "D"
6.1.9.	Main-beam headlamp	reference mark maximum intensity, 10 for "R" or "CR"
6.5.	Direction indicator lamp	categories
6.7.	Stop lamp	categories
6.14.	Retro-reflector	class
6.15.	Retro-reflector	class
6.16.	Retro-reflector	class
6.17.	Retro-reflector	class
6.18.	Side-marker lamp	type

Regulation No. 53

2.14.	Single lamp	type "D"
6.1.1.	Driving beam headlamp	class
6.2.1.	Passing beam headlamp	class
6.3.	Direction indicator lamp	category

Regulation No. 74

2.14.	Single lamp	type "D"
6.1.1.	Driving beam headlamp	class
6.2.1.	Passing beam headlamp	class

B. PROPOSAL

6. GTB would like to take the opportunity of the general discussion on approval markings in WP.29 to advance a proposal which would cover the Regulations on lighting and light-signalling devices, i.e. Regulations No.s 3, 4, 5, 6, 7, 19, 23, 31, 38, 50, 56, 57, 65, 72, 76, 77, 82, 87, 91, 98, 112 and 113. The provisions regarding markings would be amended to require the presence of markings as follows:

- a) The trade name or mark of the applicant
- b) An approval marking consisting of a circle surrounding the letter "E" followed by the distinguishing number of the country which has granted approval and an approval number assigned by the country which has granted approval. The same Contracting Party may not assign the same number to any other type of lighting or light-signalling device. This would also apply to grouped, combined or reciprocally incorporated lamps, or to lamps reciprocally incorporated with headlamps.

These provisions would

- comply with the legal requirements according to the 1958 Agreement;
- permit identification of the applicant responsible for the device;
- permit access to the approval records for the device maintained by the authority which has granted the approval;
- be in line with the provisions regarding light source modules.

7. An important prerequisite for the practical operation of the modified approval marking will be the existence of suitable databases. As part of the discussion on enforcement of type approval and conformity of production standards, WP.29 has recognized the importance of establishing an electronic database for exchange of information (TRANS/WP.29/953 par. 88). It is understood that the type approval authorities of several Contracting Parties already operate such databases. It would be highly desirable if all Contracting Parties would be prepared to establish and maintain such a system, which would be accessible by other Contracting Parties and, under certain conditions, by interested parties using proper identification. It should be noted that the manufacturers of lighting and light-signalling devices maintain records regarding the type approval of their products; such records could also be used to identify devices and obtain details on their characteristics.

8. The proposal to delete the requirement for all additional symbols would also affect the symbols mentioned in the installation Regulations, as indicated in paragraph 5. above. This would require suitable amendments to such Regulations. Attention is drawn to the discussion in GRE regarding Regulation No. 48 and a proposal to allow only the installation of devices which have been type approved according to UN/ECE Regulations (TRANS/WP.29/GRE/51 par.20).

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