

PROPOSAL AIMING AT COMPATIBILITY BETWEEN THE GTR MARKING AND
THE MARKING ACCORDING TO THE 1958 AGREEMENT

(Submitted by the representative of the European Community (EC))

During the negotiations on a global technical regulation (gtr) on safety glazing, experts expressed considerable interest in establishing a marking system within a gtr. As other informal groups might envisage similar steps, it seems advisable to develop a marking system that

- is compatible with the needs of all informal groups,
- is compatible with other legal marking obligations, e.g. those according to the 1958 Agreement, and
- needs little space.

Content of gtr marking

Three elements are candidates to become part of the gtr marking:

- The gtr Number and its amendment: “gtr 1 A2”
- The product sub-category: “snow”, “tubeless”
- The manufacturer: “XYZ Ltd.” or a manufacturer number.

However, the manufacturer indication should be complemented by at least the Country of residence in order to avoid confusion.

Content of national or regional marking

Markings can refer to a legal basis and can indicate the manufacturer or product characteristics. It might be useful to establish an inventory of markings within contracting parties to the 1998 Agreement. However, new national or regional marking requirements can arise at any time. Therefore, it is necessary to be as open as possible with regard to future requirements. These requirements could come from horizontal policy initiatives outside the control of representatives to WP.29, whilst being equally applicable to automotive industry products.

Where to put the various markings

The markings according to the national or regional requirements, or those according to the 1958 Agreement should be fixed just above or below the gtr marking so that the same moulder / stamp can be used. In order to benefit from the market value of the ECE

marking, contracting parties of both Agreements should be free to decide on the order in which the markings should be presented.

Overlapping elements

National or regional marking might also take into account the product category and the manufacturer. If so, two problems may arise:

- National or regional marking is more specific with regard to these elements, e.g. by requesting the marking of the sub-category to which the product belongs. In this case, there is either partial duplication, or marking elements alien to the proper gtr marking should be inserted into the gtr marking. The latter might cause confusion and thus devalue the future marketing value of gtr marking. Therefore it seems best to accept partial duplication.
- National or regional marking mandates a certain order or way of affixing. Here the question is whether the gtr marking obligation can be formulated in an open way: “Elements of gtr marking can also become part of a national or regional marking just above or just below the gtr marking.”

Mandatory or optional markings

Contracting parties should have the possibility either to mandate or just to allow the gtr marking. Otherwise, there would be a burden on industry that does not export beyond the boundaries of the 1958 Agreement or, more precisely, those of its contracting parties applying the relevant Regulation.

- - - - -