

Concerns of OICA about document ECE/TRANS/WP29/2007/106
(Introduction of EVSC into UNECE Regulation No. 13)

General:

Document ECE/TRANS/WP.29/2007/106 proposes a progressive introduction of EVSC on the heavy vehicles, starting with the most safety relevant. The concern of OICA addresses the amount of new approvals in the future and the capacity of the technical services to face it.

Justifications to the concern:

Paragraph 12.1.7. of the European Commission proposal ECE/TRANS/WP.29/2007/106 requires that no Contracting Party shall refuse to grant approval under this Regulation as from the time of Entry into Force of Supplement 11 to Regulation No. 13. A first assessment of the worldwide heavy vehicle industry estimates an average of 25 to 35 requests for approval during the first year following the entry into force. These approvals would imply winter tests and would come from the main European bus and truck manufacturers.

The concern of OICA is **whether the Technical Services can commit to face such a sudden workload** additional to their current "normal" amount of activity.

In addition, the same assessment provides an estimate 40 to 70 requests for approval each year during the following years. Because the number of winter test sites in Europe is extremely limited (frozen lakes), all the winter tests included in these approvals will have to take place simultaneously and on the same test sites as the already scheduled usual development testing.

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