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Item 18 of the provisional agenda

**REVISIONS AND EXTENTIONS OF APPROVALS
(Devices for indirect vision)**

Proposal for draft amendments to Regulation No. 46

**Submitted by the expert from the International Organization of
Motor Vehicle Manufacturers */**

The text reproduced below was prepared by the expert from the International Organization of Motor Vehicle Manufacturers (OICA) in order to align the provisions of Regulation No. 46 with that of the Whole Vehicle Type Approval system of the European Union (EU) (Directive 2007/46/EC) regarding the extension of existing approvals. The modifications to the current text of the Regulation are marked in bold or strikethrough characters.

*/ In accordance with the programme of work of the Inland Transport Committee for 2006-2010 (ECE/TRANS/166/Add.1, programme activity 02.4), the World Forum will develop, harmonize and update Regulations in order to enhance performance of vehicles. The present document is submitted in conformity with that mandate.

A. PROPOSAL

Paragraph 7., amend to read:

"7. MODIFICATION OF THE TYPE OF DEVICE FOR INDIRECT VISION AND EXTENSION OF APPROVAL

7.1. Every type modification of the device for indirect vision including its connection to the bodywork shall be notified to the administrative department which approved the type of device for indirect vision. The department shall then apply **the procedure contained in either paragraph 7.1.1. (Revision) or 7.1.2. (Extension).**

7.1.1. **Revision**

When particulars recorded in the information folder have changed and the administrative department considers that the modifications made are unlikely to have an appreciable adverse effect, and that in any case the device for indirect vision still complies with the requirements, the modification shall be designated a "revision".

In such a case, the approval authority shall issue the revised pages of the information folder as necessary, marking each revised page to show clearly the nature of the modification and the date of re-issue. A consolidated, updated version of the information folder, accompanied by a detailed description of the modification, shall be deemed to meet this requirement.

or

7.1.2. **Extension**

The modification shall be designated an "extension" if, in addition to the change of the particulars recorded in the information folder,

- (a) further inspections or tests are required, or**
- (b) any information on the communication document (with the exception of its attachments) has changed, or**
- (c) approval to a later series of amendments is requested after its entry into force.**

~~Require a further test report from the technical service responsible for conducting the tests.~~

- 7.2. Confirmation or refusal of approval, specifying the alterations shall be communicated by the procedure specified in paragraph 5.3. above to the Parties to the Agreement which apply this Regulation. **In addition, the index to the information package, attached to the communication document, shall be amended accordingly to show the date of the most recent revision or extension.**
- 7.3. The extension of approval shall be notified to all Parties to the 1958 Agreement applying this Regulation by the procedure set out in paragraph 5.3. above.
- 7.4. The competent authority issuing the extension of approval shall assign a series number to each communication form drawn up for such an extension."

Paragraph 16., amend to read:

"16. MODIFICATIONS OF THE VEHICLE TYPE AND EXTENSION OF APPROVAL

16.1. Every modification of the vehicle type shall be notified to the administrative department which approved the vehicle type. The department may then **apply the procedure contained in either paragraph 16.1.1. (Revision) or 16.1.2. (Extension).**

16.1.1. **Revision**

When particulars recorded in the information folder have changed and the administrative department considers that the modifications made are unlikely to have an appreciable adverse effect, and that in any case the vehicle still complies with the requirements, the modification shall be designated a "revision".

In such a case, the approval authority shall issue the revised pages of the information folder as necessary, marking each revised page to show clearly the nature of the modification and the date of re-issue. A consolidated, updated version of the information folder, accompanied by a detailed description of the modification, shall be deemed to meet this requirement.

Or

16.1.2. **Extension**

The modification shall be designated an "extension" if, in addition to the change of the particulars recorded in the information folder,

- (a) further inspections or tests are required, or**
- (b) any information on the communication document (with the exception of its attachments) has changed, or**
- (c) approval to a later series of amendments is requested after its entry into force.**

~~Require a further test report from the technical service responsible for conducting the tests.~~

16.2. Confirmation or refusal of approval, specifying the alterations, shall be communicated to the Parties to the Agreement which apply this Regulation by means of a form conforming to the model in Annex 4 to this Regulation. **In addition, the index to the information package, attached to the communication document, shall be amended accordingly to show the date of the most recent revision or extension.**

16.3. The competent authority issuing the extension of approval shall assign a series number to each communication form drawn up for such an extension."

B. JUSTIFICATION

The proposal reproduced above was prepared by the expert from OICA in order to align the UNECE regulatory system with that of the EU Whole Vehicle Type Approval (WVTA) Directive 2007/46/EC and to ease the administrative burden for both manufacturers and approval administrations regarding the extension of existing approvals. This concept was favourably received by the Working Party on General Safety Provisions (GRSG) at its ninety-fifth session (ECE/TRANS/WP.29/GRSG/74, paragraph 49) and ninety-sixth session (see ECE/TRANS/WP.29/GRSG/75, paragraph 39). The background to this proposal can be found in informal document No. GRSG-95-18.

Currently, when an information package attached to a communication document is changed, manufacturers are required to apply for an extension. Each Regulation has a paragraph detailing the process by which a modification and the consequential extension to the approval shall be managed.

According to the current wording of paragraphs 7.1.1. and 7.1.2. (for the modification of the type of device) and paragraphs 16.1.1. and 16.1.2. (for the modification of the type of vehicle), the competent authority may judge whether a further test report is needed or not. However, the administrative provisions for the two cases (paragraph 7.1.1. versus paragraph 7.1.2. and paragraph 16.1.1. versus paragraph 16.1.2.) are not well differentiated. Therefore, the

manufacturers must process all modifications as extensions. As a consequence, the competent authority must issue an amended communication document for each modification, no matter how minor it may be. Moreover, when WVTA is sought, the approval number list must be updated whenever the approval number is changed. This places additional administrative burden on the manufacturers.

In the EU system, the approval authority can use the "revision" of an existing approval when some particulars recorded in the information folder have changed. In this case, the approval authority simply issues the necessary revised pages of the information folder. However, the approval authority will use the "extension" of an existing approval when, in addition to changes to the information folder, changes to the vehicle or component type make new tests necessary, or approval to a later series of amendments is required. In this case, the approval authority issues an amended EC type approval certificate.

The principal difference between "extension" and "revision" is whether or not an amended communication document is issued. In the case of a "revision", only the revised pages of the information folder are issued.

As the basics to follow one or the other path is common to both the UNECE and the EU systems (namely the issuing of a new test report), it is consistent that the application of "revision" be introduced into the UNECE system.

In view of the wish of the European Commission to increasingly replace the EU Directives by the corresponding UNECE Regulations (CARS-21), and the constantly increasing number of countries becoming signatories to the 1958 Agreement, it seems clearly opportune to erase the administrative obstacles between the UNECE and the EU systems. An alignment, such as the proposal above, will make the Regulations annexed to the 1958 Agreement more attractive for the manufacturers who want to be present in the EU, and will make the 1958 Agreement more attractive to the countries that want to approach the EU region.
