

**Comments on ECE/TRANS/WP.29/GRSG/2011/26e**  
**(Draft amendments to Regulation No. 67/01 by the expert from Germany)**

**Comments**

Considering that:

1. even if deeply reformulated with respect to GRSG-100-27, the proposals of amendments contained in ECE/TRANS/WP.29/GRSG/2011/26 still involve procedural aspects of LPG equipment installation that are, on the contrary, in the bounds of the legislative power of the Contracting Parties (see paragraph 1.3. of Supplement 4 to Regulation No. 115).
2. the granting of one single type-approval would forbid the retrofit system manufacturer to hold the type-approval of the hose assembly only and not also of the flexible hose, whose type-approval holder would be, in this case, the hose manufacturer. This practice is safe since the final result is the sum of two subsequent valid type-approvals - and related testing procedures -, while permitting a higher level of flexibility to the industry.
3. a correct crimp-fitting can be carried out also by a third organization (other than the type-approval holder of the hose assembly), if properly instructed to make such an operation; therefore, an improvement of the current text of the Regulation could be done also by way of the insertion of new provisions on instructions of hose assembly and inspection, to be provided when hose and couplings are intended to be supplied unassembled.

AEGPL asks for more time to evaluate possible amendments to the Regulation that could ensure the achievement of the same safety targets of the proposal under discussion, while permitting certain flexibility to the industry.

---