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Working Party on Road Transport

**Group of Experts on European Agreement Concerning Work of
Crews of Vehicles Engaged in International Road Transport (AETR)**

Eighteenth session

Geneva, 4 June 2018

Item 2 (b) of the provisional agenda

Programme of Work: Appendix 1C

Appendix 1C

**Submitted by the Government of Turkey (on behalf of Automotive
Manufacturers' Association (OSD))**

This document, submitted by the Government of Turkey on behalf of Automotive Manufacturers' Association (OSD), discusses some issues related to smart tachograph workshop cards procurement process. It replaces Informal document No. 4".

Issue: Smart Tachograph Workshop Cards Procurement Process

The regulation (Regulation (EU) 165/2014) on second generation digital tachographs was published in the EU Official Journal dated February 28, 2014, which states that as from 15 June 2019, the new generation tachographs will be mandatory in commercial vehicles which will be registered in EU.

(EU) 2016/799 regulation which amended the previously published (EU) 165/2014 Regulation was published in the EU Official Journal dated May 26, 2016, establishing the technical requirements for smart tachographs. Above mentioned regulations have not been adopted in the domestic legislation in Turkey as yet.

The request of supplying 2nd generation tachograph workshop cards, at the same time with European Union application date, for Turkish manufacturers that export commercial vehicles to European Union has been brought to agenda in the related platforms including 17th Session of Expert Group on AETR Meeting on 19 February 2018. As Turkey has not yet adopted the relevant regulations, it seems not possible to furnish the OEs in Turkey with the workshop cards.

As this request will be discussed in the 18th Session of Expert Group on AETR Meeting on 4 June 2018, we would like to explain the main reasons for our request as follows;

- As specified in Article 392 of the European Union (EU) 2016/799 regulation, OEs are required to carry out the necessary setting (Calibration) immediately after the installation of the tachograph

(392) Installation shall be followed by a calibration. The first calibration may not necessarily include entry of the vehicle registration number (VRN), when it is not known by the approved workshop having to undertake this calibration. In these circumstances, it shall be possible, for the vehicle owner, and at this time only, to enter the VRN using his Company Card prior to using the vehicle in scope of Regulation (EC) No 561/2006 (e.g by using commands through an appropriate menu structure of the vehicle unit's man-machine interface.) ⁽¹⁾. Any update or confirmation of this entry shall only be possible using a Workshop Card.

- (EU) 2016/799 specifies that workshop cards are mandatory for the calibration of Smart Tachographs.

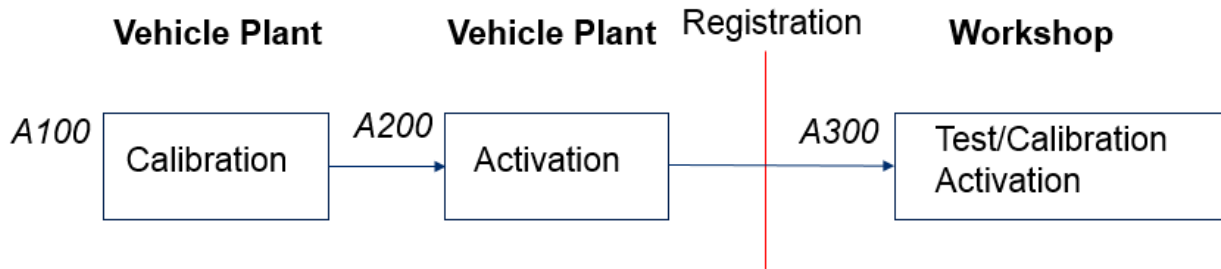
(f) 'calibration' of a smart tachograph means:

updating or confirming vehicle parameters to be held in the data memory. Vehicle parameters include vehicle identification (VIN, VRN and registering Member State) and vehicle characteristics (w, k, l, tyre size, speed-limiting device setting (if applicable), current UTC time, current odometer value); during the calibration of a recording equipment, the types and identifiers of all type-approval relevant seals in place shall also be stored in the data memory;

any update or confirmation of UTC time only, shall be considered as a time adjustment and not as a calibration, provided it does not contradict Requirement 409;

calibrating recording equipment requires the use of a workshop card;

- Technical information including tire diameter, k factor, FDR, gearbox speed etc. must be entered during the calibration process at the end of the production line, Workshop card is used to match the sensor and the tachograph during the activation process. At this point, calibration data is locked in such way that cannot be changed. To complete this action at this stage the workshop card is required. Only after these operations are completed, the tachograph can be activated and the recording will start. The quality processes in the manufacturing line will not be fulfilled unless the related processes are carried out in the production line.



- Since related items of (EU) 165/2014 and (EU) 2016/799 are not reflected into the AETR agreement yet. In this case, as of June 2019, calibration and activation of Smart Tachograph will not be available in the factories where export vehicles for EU market are produced. If the workshop cards cannot be provided within 2018, Turkish Manufacturers who export vehicles will face several operational and quality problems. Turkey is an important commercial vehicle exporter and the number of exported vehicles to the EU in 2017 is approx. 323k.

In view of the above reasons and regardless of Turkey's transition period regarding 2nd generation smart digital tachograph, it is obligatory for OEs in Turkey to have a certain number of workshop cards to be used in the production process in order to achieve activation & calibration processes before the date of smart digital tachographs become mandatory in the EU.

In order to respect the technical regulations in force, equip vehicles with the 2nd generation smart tachographs and ensure sustainability in quality processes during the manufacturing, an agreement on how to provide smart tachograph workshop cards to OEs that are located in Turkey and export commercial vehicles to EU.

Presented for the kind review and the necessary action / decision of the Expert Group on AETR.