APPROVAL MARKING IN ECE REGULATIONS

I.   The situation

Current ECE Regulations under the 1958 Agreement usually require an approval marking, allowing identification of the country having granted approval, the applicable version of the Regulation (e.g. series of amendments) and the approval number.

Such marking requirements apply to systems, components and technical units.

This OICA paper only addresses system marking.

II.   Background of system approval marking in ECE Regulations

The current requirements for system approval marking were introduced in the early stages of the 1958 Agreement framework, with the aim to allow quick and easy identification of approved types and of the applicable ECE Regulation.

Clearly, such marking requirements were established at a time when the paper documentation process, without copy machines and, last but not least, without modern information technology, was unreliable, burdensome and time-consuming.

III.   The problems of system approval marking

While system approval marking had a certain use in the past for easy identification, the situation of today is changed:

- ?? System approval marking generally does not provide any added value to either customers, technical services or authorities. Some exceptions are obviously possible, such as the ECE R24 (diesel smoke) marking requirements.

- ?? System approval marking is a burdensome process, duplicating other modern identification means.

- ?? With current and modern information technology, authorities and technical services can easily check vehicle approval numbers, with all necessary documentation readily available. The system approval number on the vehicle itself is superfluous.

- ?? Several countries, applying a type approval or certification system, do not require system approval marking in their national regulations.

IV.   OICA proposal

Bearing in mind the above, OICA submits to the WP29 approval the request to critically re-examine, case by case, ECE Regulations where requirements for system approval marking could be deleted.

If WP29 accepts this general principle, OICA would endeavour to prepare, for each concerned ECE Regulation, the necessary amendment proposals; examination of these proposals could then be conducted by the appropriate Working Party.

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