

Proposal for amendments to UN Regulation No. 90

(Uniform provisions concerning the approval of replacement brake lining assemblies, drum-brake linings and discs and drums for power-driven vehicles and their trailer)

I. Proposal

Paragraph 6.1.1, amend to read:

“6.1.1. Replacement brake lining assemblies or replacement drum brake linings conforming to a type approved in accordance with this Regulation shall be marketed in axle sets. **In case of category L vehicles, they may be marketed in caliper sets and/or drum sets.**”

Paragraph 6.1.2, amend to read:

“6.1.2. Each axle, **caliper and drum** set shall be contained in a sealed package constructed to show previous opening.”

Paragraph 6.1.3.4., amend to read:

“6.1.3.4. The vehicles/axles/brakes for which the contents are approved. **It is allowed to provide this information through digital format (e.g. QR code, internet website) leading at least to a general application catalogue.**”

Paragraph 6.1.4., amend to read:

“6.1.4. Each package shall contain fitting instructions in an official ECE language, supplemented by the corresponding text in the language of the country where it is sold.

It is allowed to provide these fitting instructions also through digital format only (e.g. QR code, internet website).”

II. Justification

A. Paragraphs 6.1.1. and 6.1.2.:

In case of category L vehicles application, the same brake lining assemblies could be fitted for a various wide of different applications.

For example, the same brake pads/shoes could be fitted both on vehicle with single disc and on vehicle with double discs; moreover, the same brake pads/shoes could be fitted both on front application and on rear application vehicle.

Since there are too many cases or variables and it's impossible to have a package for axle set for category L vehicles: the proposal of amendment is meant to consider the caliper set/drum set, instead of the axle set.

B. Paragraph 6.1.3.4.:

Packaging of brake pads/drums has a limited dimension and it's impossible to report in the packaging all applications approved, because there is no space available.

In addition, should all applications approved be reported in the packaging, the updating of each packaging every time there is a new application available in the market would be needed.

This is not feasible and it represents a risk to have a product with no updated information for the final consumer.

For these reasons, the proposal of amendment is aimed at allowing, as option, to report the approved vehicles/brakes/axle information through digital format (e.g. QR code, website) leading at least to a general catalogue.

Moreover, using digital elements, it's also possible to have a green solution and having a less environmental impact.

The modification proposal is optional, and not exclusively for category L vehicles, but it is meant for every type of motor vehicles even if the major criticalities are with category L vehicles because their packaging is smaller than brake pads/drums of passenger car.

C. Paragraph 6.1.4.:

The current requirement asks to have fitting instructions inside the packaging with at least an ECE language supplemented by the corresponding text of the language of the country where the product is sold.

It means two options:

To have a specific fitting instruction for each country where the component is sold; or

To have a unique fitting instruction with all languages.

Option 1 is not feasible from management and logistic point of view.

Option 2 is not feasible because there is limit space available in the packaging: for example, to be sold in EU (that recognize UNECE R90), it's needed to have all official 24 languages of EU in a unique fitting instruction paper but there are applications where the packaging is too small to contain the fitting instruction paper.

For these reasons, the proposal of modification asks the possibility to have these fitting instructions also through digital format only (e.g. QR code, internet website, ...).

Moreover, using digital elements/formats, it's possible to reduce the environmental impact because the instructions become paperless.

The modification proposal is optional, and not exclusively for category L vehicles but it is meant for every type of motor vehicles: even if the major criticalities are with category L vehicles because their packaging is smaller than brake pads/drums of passenger cars.
