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**Economic Commission for Europe**

Inland Transport Committee

**World Forum for Harmonization of Vehicle Regulations****Working Party on Automated/Autonomous and Connected Vehicles****Sixteenth session**

Geneva, 22-26 May 2023

Item 10 of the provisional agenda

**UN Regulation No. 90****Proposal for a Supplement 11 to the 02 series of amendments  
to UN Regulation No. 90 (Replacement braking parts)****Submitted by the experts from Italy and the European Association of  
Automotive Suppliers (CLEPA)\***

The text reproduced below was prepared by the experts from Italy and the European Association of Automotive Suppliers (CLEPA) to clarify the packaging and labelling requirements for some types of brake lining assemblies, which could be fitted on various different applications and to allow the option of using a QR code (or another type of digital data carrier) to replace some information printed on or included in the packaging. This proposal is based on the informal document GRVA-15-14, submitted by Italy and the informal document GRVA-15-25, submitted by CLEPA. The modifications to the current text of the Regulation are marked in **bold** for new and ~~strikethrough~~ for deleted characters.

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\* In accordance with the programme of work of the Inland Transport Committee for 2023 as outlined in proposed programme budget for 2023 (A/77/6 (part V sect. 20) para 20.6), the World Forum will develop, harmonize and update UN Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.



## 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 vehicles of Category L, they may be marketed in calliper sets and/or drum sets.**”

*Paragraph 6.1.2., amend to read:*

- “6.1.2. Each axle, **calliper 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. **If necessary, it is allowed to supplement this information by means of a QR code or weblink or another type of digital carrier that shall be placed, printed or engraved visibly, clearly legibly and indelibly on the packaging.**”

*Insert a new paragraph 6.1.3.4.1., to read:*

- “6.1.3.4.1. **In case a digital carrier is used, near the QR code or weblink or other digital carrier it shall be printed the words “Full list of approved applications”. The digital application listing shall be edited in a printable format and available for the lifetime of the product, at least five years counted from the time when production is definitely discontinued. The consumer shall not be required to submit any personal data before being able to access the digital application listing.**”

*Insert new paragraphs 6.3., 6.3.1., 6.3.2. and 6.3.3., to read:*

- “6.3. **The fitting instructions required under paragraphs 6.1.4. to 6.1.4.4. and under paragraphs 6.2.1.4. to 6.2.1.4.2. may be provided by means of a QR code or a weblink or another type of digital data carrier that shall be placed, printed or engraved visibly, clearly legibly and indelibly on the packaging or included in the packaging.**
- 6.3.1. **Near the QR code or weblink or other digital data carrier it shall be printed or engraved visibly, clearly legibly and indelibly the words “Read instructions first” and the ISO 2575 N.03 symbol (Operator’s manual, operation instructions):**



- 6.3.2. **The digital instructions shall be edited in a printable format and available for the life time of the product, at least five years counted from the time when production is definitely discontinued. A statement, added to the approval documentation, confirming that this information will be available for at least five years after the production has been discontinued, shall be provided by the manufacturer.**
- 6.3.3. **The consumer shall not be required to submit any personal data before being able to access the digital fitting instructions.**”

## II. Justification

### A. Paragraphs 6.1.1. and 6.1.2.

1. In the case of vehicles of Category L, the same brake lining assemblies could be fitted on various and different applications. For example, the same brake pads/shoes could be fitted both on a vehicle with single disc and on a vehicle with double discs. Moreover, the same brake pads/shoes could be fitted both on the front and on the rear.
2. Since there are too many cases or variables, it's impossible to have a packaging per axle set, for Category L vehicles. The proposed amendment intends to consider the calliper set/drum set, instead of the axle set.

### B. Paragraph 6.1.3.4. and 6.1.3.4.1.

3. The packaging of brake pads/drums has a limited dimension and in some case 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 would be needed each time there is a new application available on the market. 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 amendment proposal is aimed at allowing, as an option, to provide 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 opt for a more sustainable solution and reduce environmental impacts.
4. The proposed solution is optional, and not exclusively for Category L vehicles. It is meant for every category of motor vehicles, even if the major criticalities are with Category L vehicles because their packaging is smaller than those for brake pads/drums of other categories of motor vehicles.

### C. Paragraphs 6.3. to 6.3.3.

5. This proposal aims at reducing waste and costs by allowing manufacturers to opt for providing all the required fitting instructions via a QR code or another type of digital data carrier. Fitting instructions are provided to date in the form of printed papers included in the packaging, very frequently carrying two different languages amongst the many dozens of possible combinations. This is a waste of resources, space and weight that creates logistic costs. This proposal is therefore in line with several national policy on waste reduction, labelling/packaging information and digitalisation already, in place in various Contracting Parties.
6. It shall be noted that [Supplement 5 to the 03 series of amendments to Regulation No. 129](#) (Enhanced Child Restraint Systems), which entered into force in January 2022, allows the alternative use of a QR code or weblink to replace the paper instructions. Considering that under the third revision of the 1958 Agreement, the introduction of the Database for the Exchange of Type Approval (DETA) and the Unique Identifier (UI) leads toward digitalisation of approval information and that the latter feature (i.e. UI) will also bring to all repair workshops the IT equipment needed to also read a QR code, it is assumed that this proposal will not cause an economic burden to users.