

Assessment of UN Regulations Under the Purview of GRVA With Regards to the Use of the Unique Identifier (UI)

Assessment of UN Regulations Under the Purview of GRVA With Regards to the Use of the UI

	Use of UI prohibited	Use of UI possible			Remarks
UN Regulations under the purview of GRVA		Is there additional information required in the approval mark (Yes/No)	Summary document necessary (Yes/No)	Should additional physical marking remain on the product (Yes/No)? In case of yes, which one(s)?	E.g. justifications for additional physical markings that must remain on the product

Schedule 5 to the 1958 Agreement – Circulation of Approval Documentation

«3. If the type approvals applicable to a wheeled vehicles, equipment or parts are stored on the secure internet database, then **the approval markings required by UN Regulations may be replaced by a Unique Identifier (UI) preceded by the symbol (UI), unless specified otherwise in the UN Regulations.** Such unique identifier shall be generated by the database automatically».

Consequences:

- **As the manufacturer is responsible for placing markings on the product, it is up to the manufacturer, which marking to place, unless specified otherwise in UN Regulations**
- **Either approval markings required by UN Regulations or a UI must be on the product**
- **A UN Regulation may prohibit the use of UI**

Who Are the Addressees of the Information Contained in the Approval Markings?

- Inspectors of different entities:
 - Approval authorities – COP inspection
 - Market surveillance
 - Roadworthiness
 - Road police. This entity needs quick access to the specific information without reaching the database. The part of the approval marking for quick verification by the road police should retain on the product. **This is the case of UN R 89 – vehicle approval.**
- General public – Consumers:
 - In some cases, the approval marking is considered as the evidence of product quality and safety (e.g., UN R 22 - motorcycle helmets)
 - In some cases, the approval marking contains specific product information (e.g., UN R 90 – replacement brake linings, disks and drums)

For such cases, normally, the use of UI is prohibited by the respective UN R

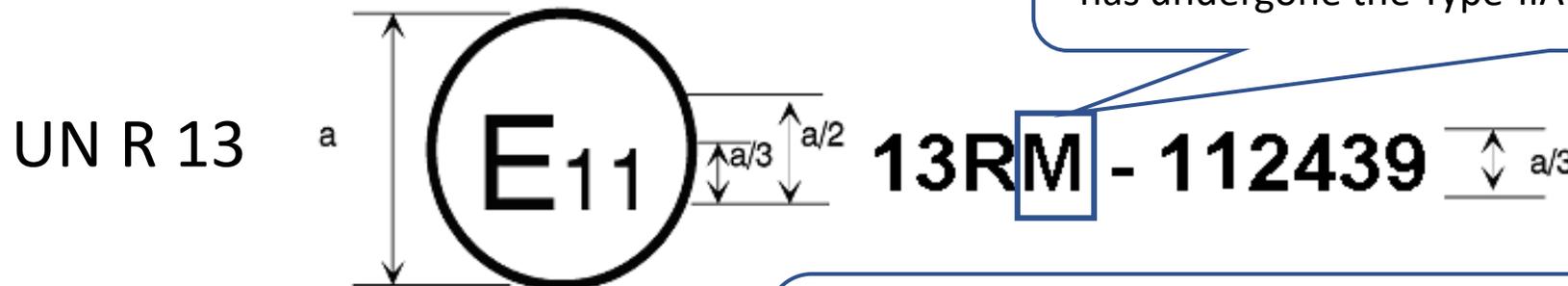
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UN Regulations under the purview of GRVA					E.g. justifications for additional physical markings that must remain on the product
UN R 90	Yes	N/A	N/A	N/A	
All the rest	N/A			Yes, either the approval mark or the UI marking	

The Content of the Approval Markings

“General” marking: A circle surrounding the letter "E" followed by the distinguishing number of the country which has granted approval and the approval number: the number of this UN Regulation followed by the letter 'R' and the first two digits indicating the series of amendments to this UN Regulation in force at the time of issue of the approval.

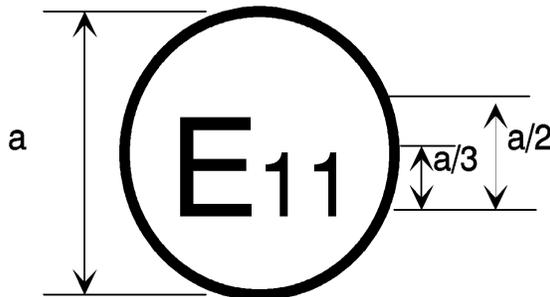
Additional information: For vehicles of categories M2 and M3, the letter M in the approval mark means that the type of vehicle has undergone the Type-IIA test instead of Type-II test.



Additional marking: Annex X to UN R 13 stipulates an additional marking for trailers showing the brake forces based on the load of the vehicle. This is quite critical marking, so that it cannot be removed. However, this marking is considered not to be the approval marking and not substituted by the UI. So, the marking per Annex X shall remain as it is.

The Content of the Approval Markings

UN R 13-H
00 series of
amendments

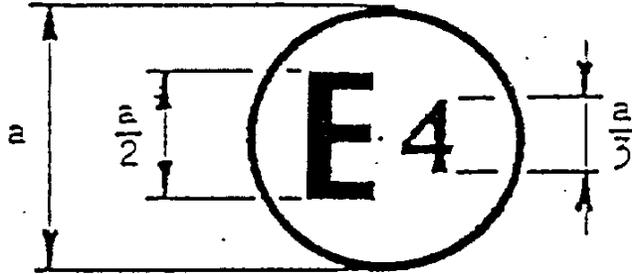


13H**ESC**-002439 $\updownarrow a/3$

Additional information: In the case of a vehicle complying with the Electronic Stability Control and Brake Assist System requirements of Annex 9 to this Regulation, the additional letters "**ESC**" shall be placed immediately to the right of the letter 'R'. In the case of vehicles complying with the Vehicle Stability Function requirements of Annex 21 to Regulation No. 13 and the Brake Assist System requirements of Annex 9 to this Regulation, the additional letters "**VSF**" shall be placed immediately to the right of the letter 'R'.

The Content of the Approval Markings

UN R 89
Vehicle
approval

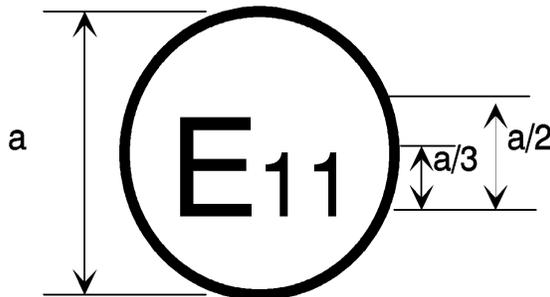


89 R - 002439



Additional information: A rectangle surrounding a figure (or a number of figures), expressing the set speed (or range of set speeds) in km/h (and mile/h if requested by the applicant).

UN R 152



152R - 002439 CPB



Additional information: A combination of letters C, P and B follows the “general” approval mark and identifies the tests had performed, respectively, car to Car, car to Pedestrian, car to Bicycle.

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UN Regulations under the purview of GRVA					E.g. justifications for additional physical markings that must remain on the product
UN R 13	N/A	Yes		Yes, either the approval mark or the UI marking plus marking per Annex X to UN R 13	
UN R 89 vehicle approval	N/A	Yes		Yes, either the approval mark or the UI marking plus the set speed	

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UN Regulations under the purview of GRVA					E.g. justifications for additional physical markings that must remain on the product
UN R 13H-00	N/A	Yes		Yes, either the approval mark or the UI marking	No additional information is needed on the product in the case if UI is marked.
UN R 152	N/A	Yes		Yes, either the approval mark or the UI marking	No additional information is needed on the product in the case if UI is marked.

Schedule 5 to the 1958 Agreement – Circulation of Approval Documentation

«4. All Contracting Parties applying a UN Regulation shall have access to the information for that UN Regulation contained in the database by using the Unique Identifier and this will provide access to the relevant information relating to the specific approval(s).».

Consequences:

- The UI concept would work only if interested entities of a Contracting Party have an access to the database
- Such entities should have an access to the database.
- Each set of approval documentation pursuant to each UN Regulation shall include the summary document available for the access of general users of the DETA database.
- The category of general users should be specified, and may include, e.g., local offices of the roadworthiness inspection and market surveillance authorities.

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All, except UN R 90			Yes*		

* The summary document can be based on the form of communication on type approval with the addition of other relevant information, e.g., type of the test undergone per UN R 13.

Reflection on the Combined Use (for Several Approvals) of One UI

The GRs were invited to reflect on the possibility to combine several markings with one Unique Identifier and discuss if details should be added to the UN Regulations.

Proposal:

- The allocation of one UI to several approvals should be possible for the product of the same type (according to the product type definition).
- Considering the UN Regulations under the purview of GRVA, the same vehicle type could have the approvals granted pursuant to UN Regulations Nos. 13, 79, 130, 131, 155, 156. Another combination of approvals under the same UI could include UN Regulations Nos. 13-H-01, 79, 139, 140, 152, 155, 156. Approvals pursuant to other UN Regulations under purview of other GRs could be added to the same UI, as well.
- The updates of the specific approvals (e.g., extensions) should change the UI according to the guidelines established by the IWG on DETA.
 - Referring to the specific UI should open an access to the actual set of approvals.

Thank you for your attention!