

Comments and amendment proposal to working document ECE/TRANS/WP.29/GRVA/2023/10

(Amendment of Annex 18 to UN R13 (CEL) for Electro-Mechanical Brake)

I. Proposed changes to ECE/TRANS/WP.29/GRVA/2023/10 (in bold text)

- 12.1.1. As from the official date of entry into force of the XX series of amendments, no Contracting Party applying this Regulation shall refuse to grant or refuse to accept type approvals under this Regulation as amended by the XX series of amendments.
- 12.1.2. As from the official date of entry into force of the XX series of amendments, Contracting Parties applying this Regulation shall grant type approvals *for a vehicle equipped with an electro-mechanical braking system* only if the vehicle type to be approved meets the requirements of this Regulation as amended by the XX series of amendments.
- 12.1.3. As from 1 September 2027, Contracting Parties applying this Regulation shall not be obliged to accept type approvals to the preceding series of amendments, for a vehicle type having a braking system equipped with an electronic control system, first issued after 1 September 2027.
- 12.1.4. As from 1 September 2029, Contracting Parties applying this Regulation shall not be obliged to accept type approvals issued to the preceding series of amendments to this Regulation.
- 12.1.5. Notwithstanding paragraph 12.1.4., Contracting Parties applying this Regulation shall continue to accept type approvals issued according to the preceding series of amendments to this Regulation, for the vehicles which are not affected by the **technical changes applicable to electro-mechanical braking systems** introduced by the XX series of amendments.
- 12.1.6. Notwithstanding the transitional provisions above, Contracting Parties whose application of this Regulation comes into force after the date of entry into force of the most recent series of amendments are not obliged to accept type approvals which were granted in accordance with any of the preceding series of amendments to this Regulation/ are only obliged to accept type approval granted in accordance with the XX series of amendments.
- 12.2. General transitional provisions:
- 12.2.1. Contracting Parties applying this Regulation may grant type approvals according to any preceding series of amendments to this Regulation.
- 12.2.2. Contracting Parties applying this Regulation shall continue to grant extensions of existing approvals to any preceding series of amendments to this Regulation

II. Comments and Justification for proposed changes

- The new requirements proposed in ECE/TRANS/WP.29/GRVA/2023/10 (UK) are mainly addressing new EMB technology, but also potentially existing systems on the market (e.g. Electronic Braking Systems).
- Industry does not see a need to apply those new requirements to systems existing on the market, since they introduce no technical changes to the vehicles but only modify the method to assess the electronic systems. We do not see any added value, but only a burden for both Industry and the technical services, to re-approve existing systems, which have in some cases been developed more than 10 years ago (the pace to renew HCVs electronic platforms is indeed much lower than passenger cars'), without any safety issues in the field.
- Industry considers this proposal to amend Annex 18 (CEL) to the UN R13 should be synchronized with the amendment in development for the Electro-Mechanical Brake technology.