

## **Proposal for a new supplement to Regulation No. 110**

### **“CNG and LNG vehicles”**

#### **Submitted by the experts from the European Association of Automotive Suppliers – CLEPA**

The text reproduced below was prepared by the experts from the European Association of Automotive Suppliers (CLEPA). It proposes to update UN Regulation No. 110 by adding different options to fulfil marking requirements in cases where more than one Regulation applies (e.g. avoid duplicating the E-Marking) as already allowed today by UN Regulation No. 107. It also proposes a reduced size of the E-Marking as already allowed today by UN Regulations No. 67 and No. 158. This proposal is particularly relevant for small size components. The proposed modifications to the current text of the UN Regulation No. 110 are marked in **bold** (or **bold red**) for new and ~~strike through~~ for deleted characters.

## I. Proposal

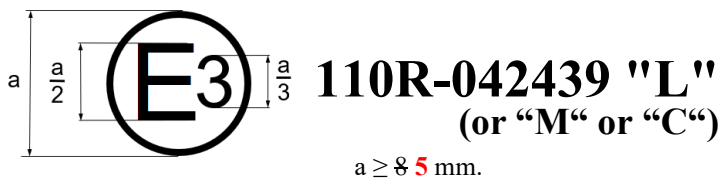
*Insert new paragraph 7.4.3., to read:*

“7.4.3. If the component conforms to a component type approved under one or more other UN Regulations, and if the country which has granted the different approvals is the same, the symbol prescribed in paragraph 7.4.1. above need not be repeated for that specific country; in such a case, the Regulation and approval numbers and the additional symbols of all the Regulations under which approval has been granted by the same country shall be placed in rows to the right of the symbol prescribed in paragraph 7.4.1. above. “

*Amend the example of the arrangement of the approval mark in Annex 2A, as follows:*

### “ Example 1

(See paragraph 7.2. of this Regulation)



The above approval mark affixed to the CNG and or LNG component shows that this component has been approved in Italy (E 3), pursuant to Regulation No. 110 under approval number 042439. The first two digits of the approval number indicate that the approval was granted in accordance with the requirements of Regulation No. 110 as amended by the 04 series of amendments.

The letter "L" indicates that the product is suitable for use with LNG.

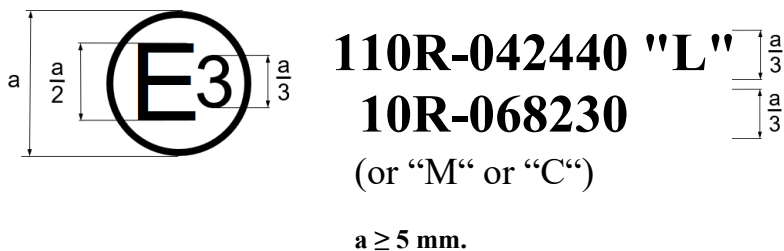
The letter "M" indicates that the product is suitable in moderate temperatures.

The letter "C" indicates that the product is suitable in cold temperatures.

*Add a new Example 2 of the arrangement of the approval mark in Annex 2A, as follows:*

### Example 2

“(See paragraph 7.4.3 of this Regulation)



The above approval mark affixed to the CNG and or LNG component shows that this component has been approved in Italy (E 3), pursuant to Regulation No. 110 under approval number 042440 and pursuant to Regulation No. 10<sup>1</sup> under approval number 068230. The first two digits of the approval number indicate that the approval was granted in accordance with the requirements of Regulation No. 110 as amended by the 04 series of amendments and in accordance with the requirements of Regulation No. 10 as amended by the 06 series of amendments.

The letter "L" indicates that the product is suitable for use with LNG.

The letter "M" indicates that the product is suitable in moderate temperatures.

The letter "C" indicates that the product is suitable in cold temperatures.

<sup>1</sup> This number is given merely as an example.

## II. Justification

Vehicle components are often in the scope of more than one UN Regulation. Placing two or more distinct UN approval marks on one component is complex and burdensome, especially for small size components.

UN Regulation No. 107 specifically allows different options to fulfil the marking requirements in cases where more than one Regulation applies (e.g. avoid duplicating the E-Marking, hence saving space and simplifying the requirement). UN Regulations No. 67 and No. 158 allow minimum E-Marking size of 5 mm.

The flexibility provided by these UN Regulations is particularly relevant and necessary in the case of small components with very limited surface available where to print regulatory marking (e.g. valves, sensors). However, such flexibility is not included in UN Regulation No. 110. The proposal aims to achieve regulatory harmonization in terms of the options available to fulfil marking requirements by extending the options provided by UN Regulations No. 107, No. 67 and No. 158 to UN Regulation No. 110 and in particular:

- (1) that in case more than one UN Regulation applies to one component, then the E-Marking may be not duplicated (i.e. allow the so-called “Twin Marking”),
- (2) that the dimension of the E-Marking is reduced to address the needs of small size components.