

## **Proposal for a new supplement to Regulation No. 118**

### **“Fire resistance of interior materials”**

#### **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. 118 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. 118 are marked in **bold** (or **bold red**) for new and ~~strike through~~ for deleted characters.

## I. Proposal

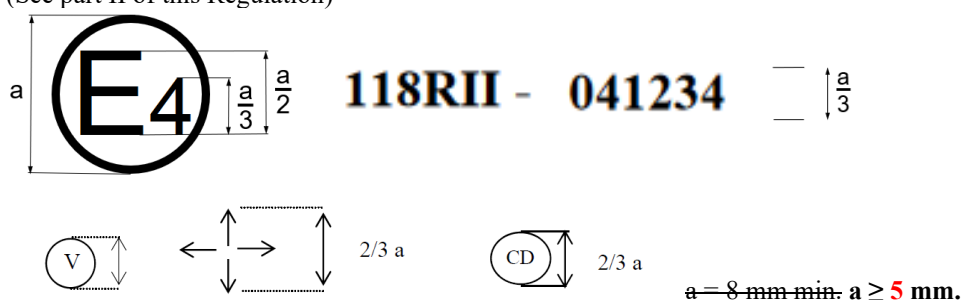
*Add a new paragraph 4.4.3.1 to read:*

**“4.4.3.1. If the component conforms to a component type approved, under one or more other Regulations annexed to the Agreement, in the country which has granted approval under this Regulation, the symbol prescribed in paragraph 4.4.1. above need not be repeated; in such a case, the Regulation and approval numbers and the additional symbols of all the Regulations under which approval has been granted in the country which has granted approval under this Regulation shall be placed in rows to the right of the symbol prescribed in paragraph 4.4.1. above.**  
“


*Amend Example 2 of the arrangement of the approval mark in Annex 5, as follows:*


### Example 2


(See part II of this Regulation)



The above approval mark affixed to a component shows that the type concerned was approved in the Netherlands (E4) pursuant to Part II of UN Regulation No. 118 under approval number 041234. The first two digits (04) of the approval number indicate that the approval was granted in accordance with the requirements of the 04 series of amendments to UN Regulation No. 118.

The additional symbol  indicates the direction which the component may be installed.

The symbol  indicates that the component fulfils the requirements in paragraph 6.2.2.

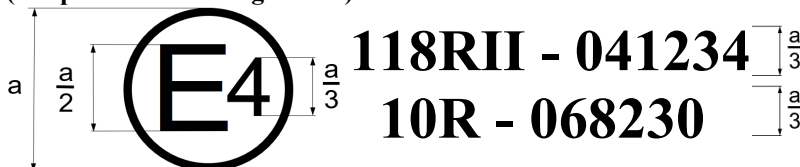
The symbol  indicates an approval as a complete device such as seats, separation walls, etc.

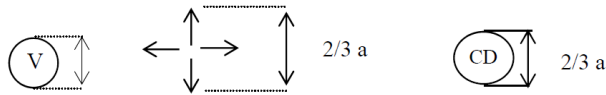
The additional symbols are only used if applicable.

*Add a new Example 3 of the arrangement of the approval mark in Annex 5, as follows:*

### Example 3

(See part II of this Regulation)






$a \geq 5 \text{ mm.}$

The above approval mark affixed to a component shows that the type concerned was approved in the Netherlands (E4) pursuant to Part II of UN Regulation No. 118 and Regulation No. 10<sup>1</sup>.

The first two digits of the approval number indicate that, at the date when the respective approvals were given, Regulation No. 118 included the 04 series of amendments and. Regulation No. 10 included the 06 series of amendments.

The additional symbol indicates the direction which the component may be installed.

The symbol  indicates that the component fulfils the requirements in paragraph 6.2.2.

The symbol  indicates an approval as a complete device such as seats, separation walls, etc.

The additional symbols are only used if applicable.

## 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. sensors). However, such flexibility is not included in UN Regulation No. 118. 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. 118 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.

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