



Deployment of type approval procedures in Georgia

The implementation evolution, the current status and further steps

The evolution

- **The Action Plan** has considered in the first phase, the amendments to the Law on Motor Transport and elaborating the Technical Regulation which includes the required provisions for the type approval process, in line with the UN 1958 Agreement.
 - **The Law on Motor Transport** was updated;
 - **The Technical Regulation** was adopted in January 2023 as the Government Decree no.15 and will entry into force in December 2023.

- **During the transitional period**, the Georgian Working Group from the Land Transport Agency, decided to request assistance for the practical deployment of the administrative, technical and legal prescriptions.

- **The UNECE Sustainable Transport Division** responded to the Georgian request with a project to be implemented by an external expert until the end of 2023.

The main outcomes

- **A report** on legal and technical matters related to the realization of Type Approval Agreement into the practice;
- **Assistance to the working group** established by the LEPL Land Transport Agency and the Ministry of Economy and Sustainable Development of Georgia in legal and technical matters related to the realization of Type Approval Agreement into the practice;
- **Identifying and evaluating technical risks/threats** (if any) stemming from realization of the Type Approval;
- **Strengthen the capacities** of the national stakeholders in respect of various procedures of the Type Approval process.

Assessment of the legislation entered into force since 2020

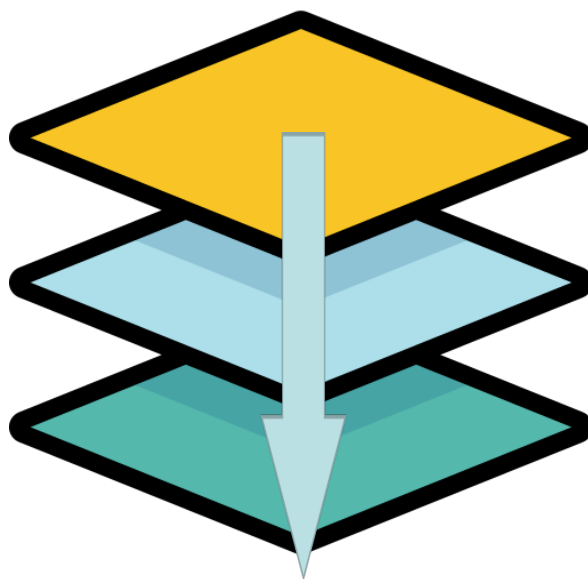
The Inputs:

- **The primary legislative act, the Law on Motor Transport**, was amended and added specific definitions for `type approval` and for `device, part, system, component and separate technical units`.
 - Article 8 of the same legislative act, **clearly designated the LEPL Land Transport Agency as the Georgian type approval authority** and it was stated that the type approval process would be described in a corresponding Government normative act.
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- **The secondary legislative act, the Technical Regulation was adopted as the Government Decree No.15.** The content of this regulatory act has been overlapped (article by article) with the outcomes concluded for phase I of the Action Plan and with the prescriptions of the UN 1958 Agreement including its Schedules.

The assessment method

Overlapping the three main sources of information:

Assessment table



Recommendations

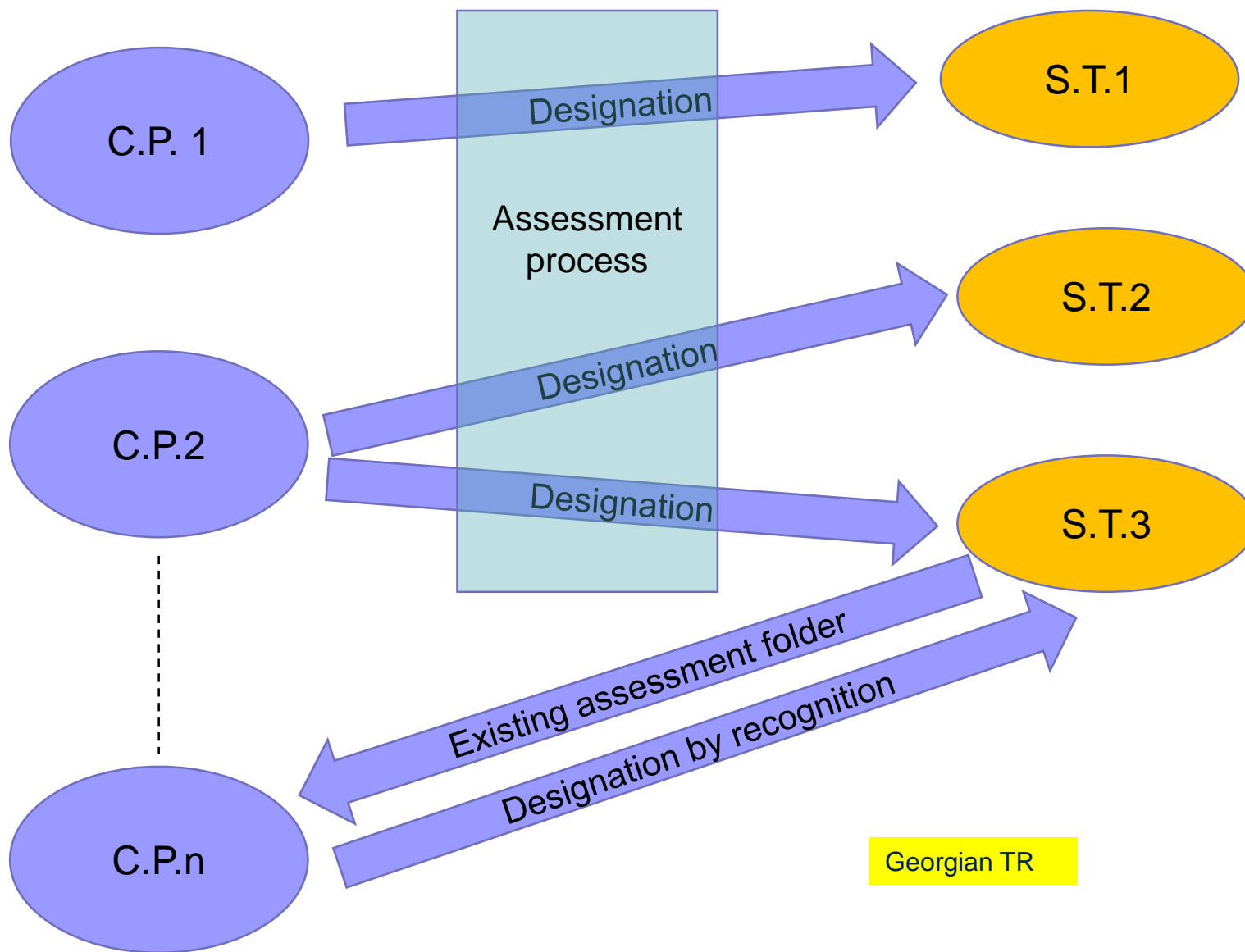
1. The national legislation in force in Georgia, information regarding the existing plans, projects and proposals received from the stakeholders;
2. The international legal framework UN 1958 Agreement;
3. The ISO standards and the EU vehicle approval regulations;

The Range of the assessment

- UN 1958 Agreement Schedules, R.E.3
- EU Regulation 2018/858;
- ISO 3779, ISO 3780, and ISO 4030 – VIN and WMI code ;

The Results

- The Technical Regulation **adapts for the Georgian specific conditions** the prescriptions of the UN 1958 Agreement, the EU framework Regulation for vehicles, and the ISO standards for VIN, WMI and manufacturer plate.
- the Georgian TAA would consider designating Technical Services already designated by other Contracting Parties of the 1958 Agreement and they prefer to delegate to the TS the tasks for the assessment of the information file and the conformity evaluation of vehicle, equipment and part after the testing process and before issuing the approval certificate.
- Considering the approach presented by LEPL-LTA, it was proposed the adaptation of several articles related to the TAA capability and to the recognition of the assessments carried out by the authorities of other Contracting Parties of the UN 1958 Agreement, for the designation of their Technical Services.
- In this respect, if a Technical Service applies for the designation by the Georgian authority and it is already designated by another Contracting Party, then LEPL-LTA can consider its existing assessment folder in the designation process, without repeating all the audits and evaluation steps.

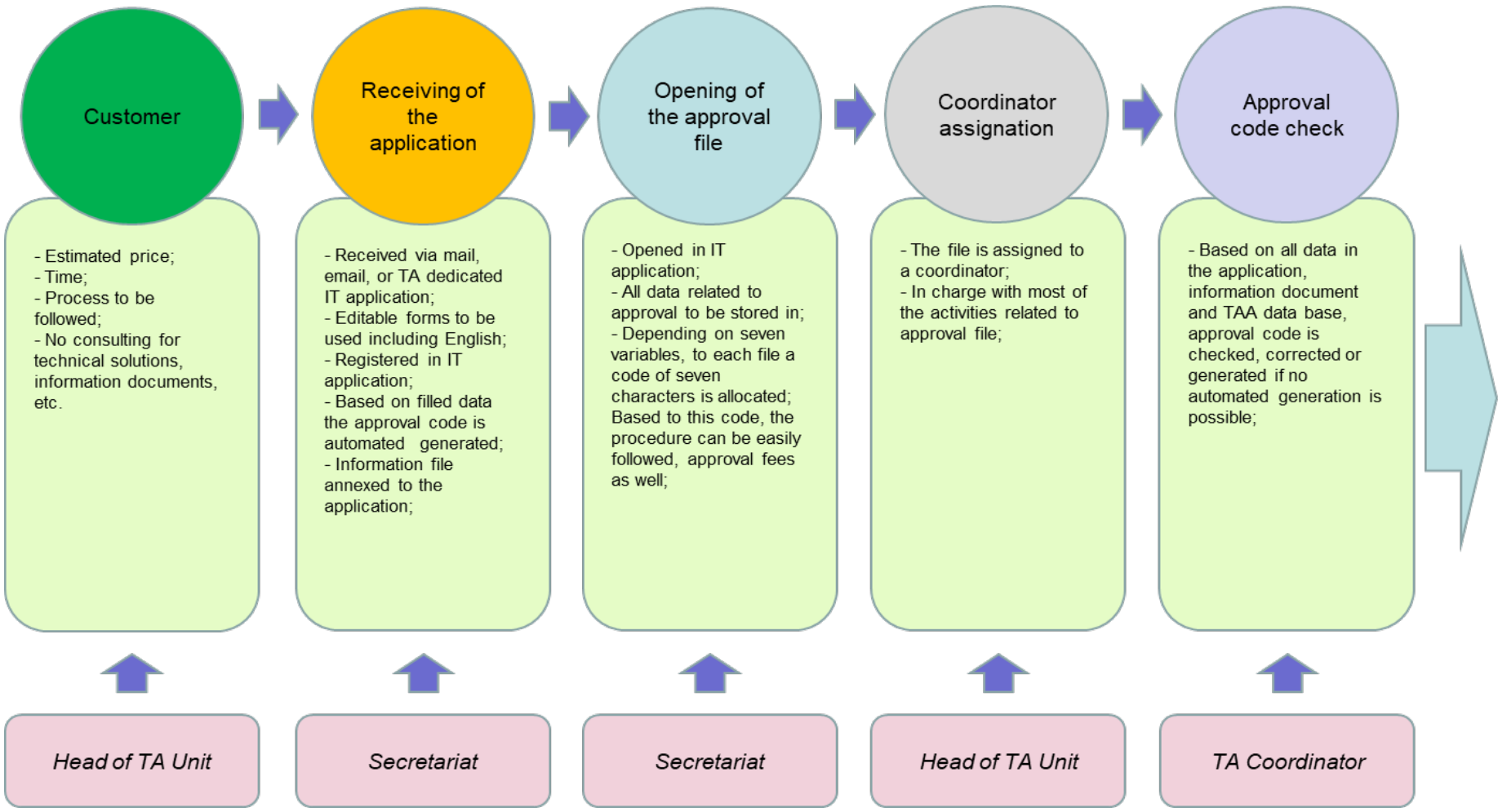


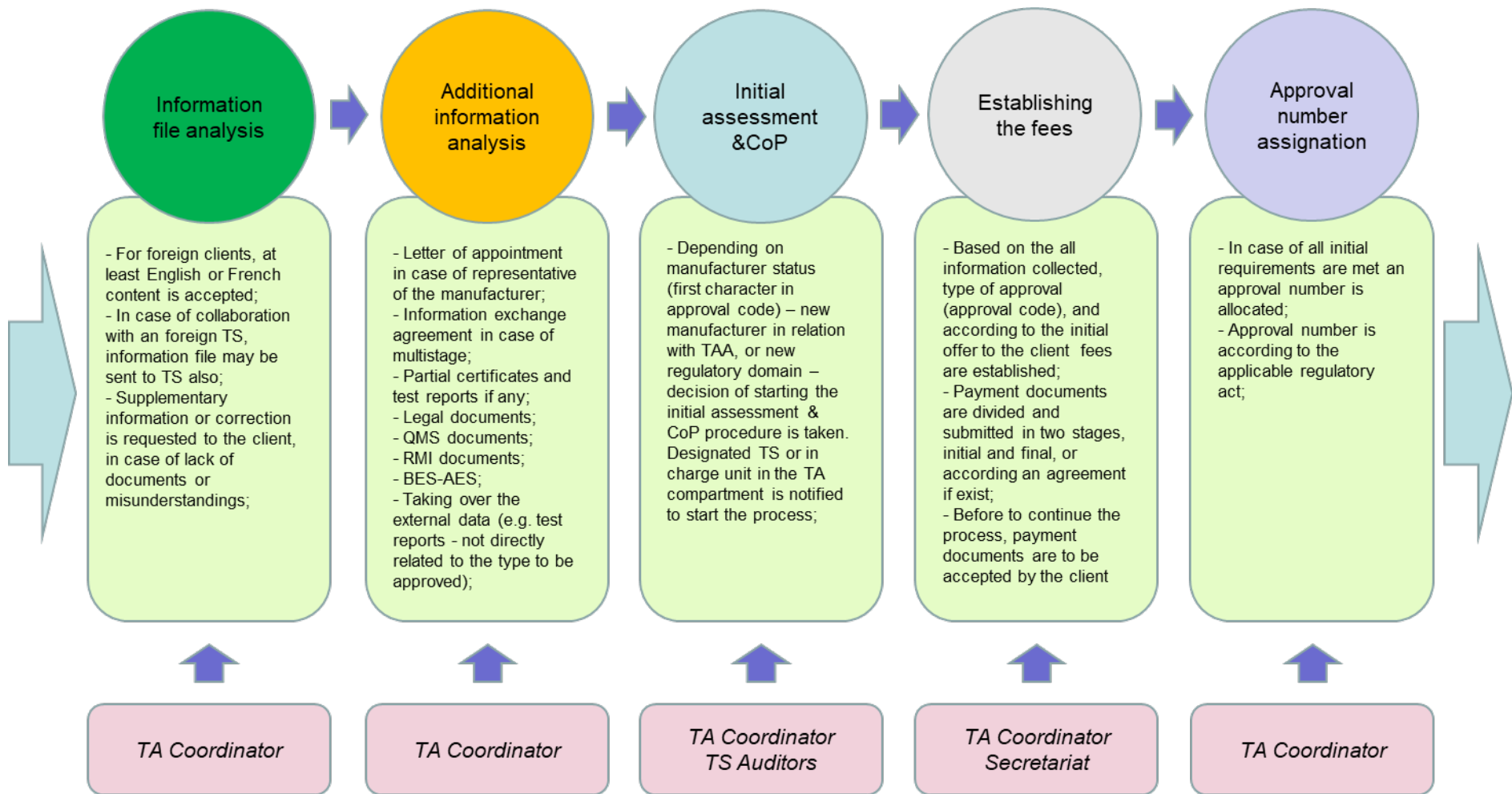
Georgian TR

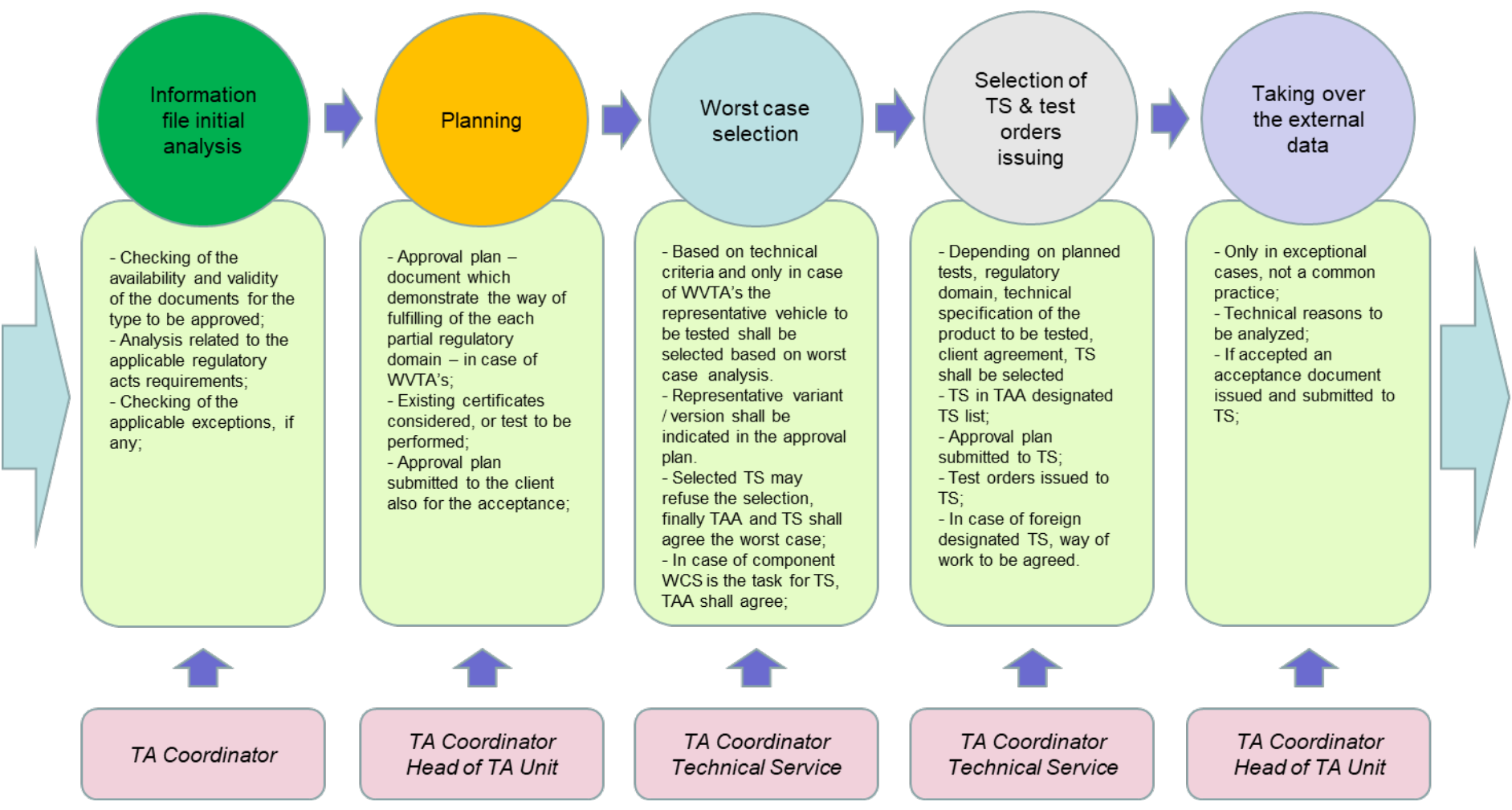
Assistance for LAND TRANSPORT AGENCY Working Group

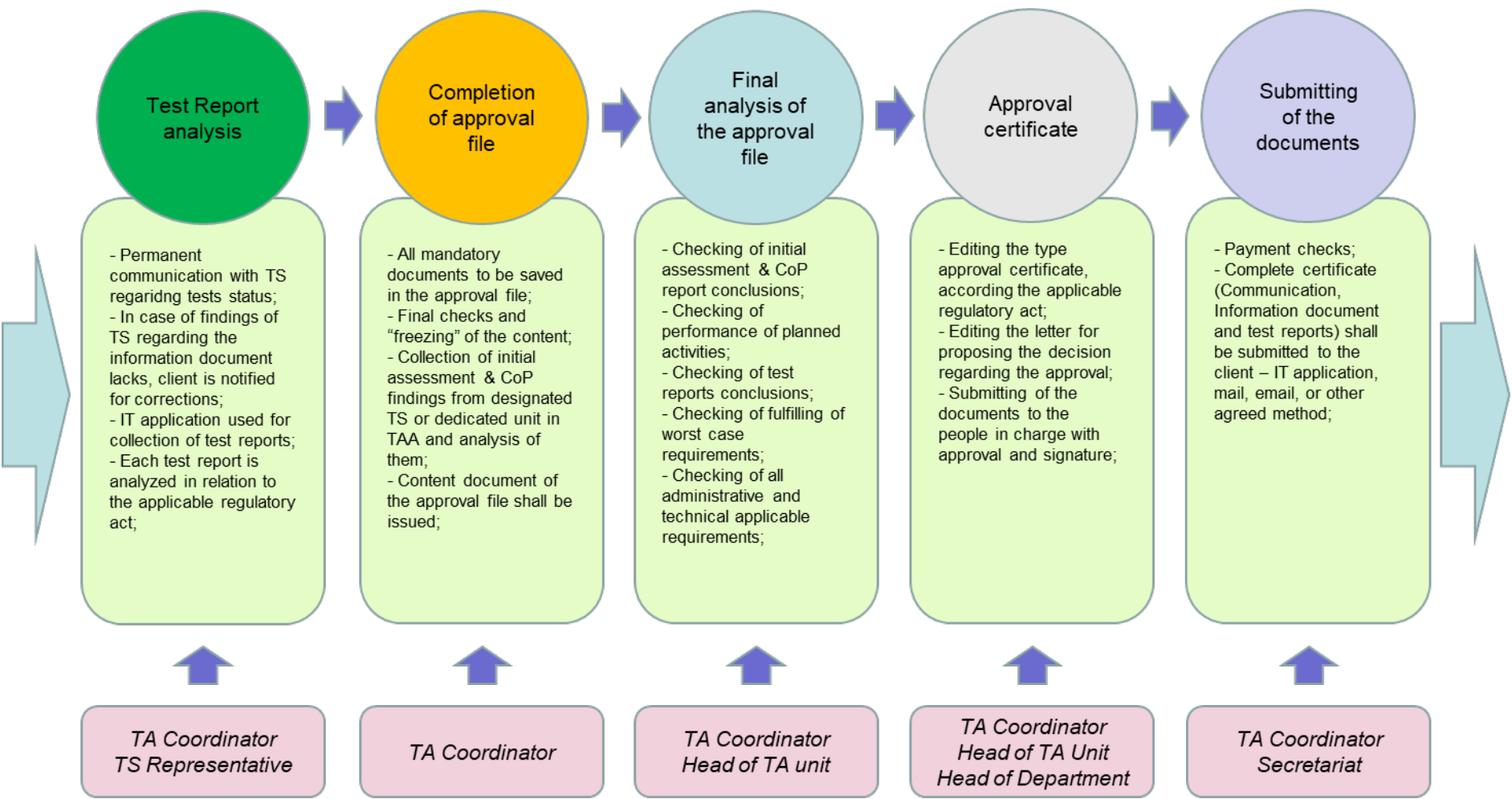
- **On-site visit to Tbilisi on April 10 – 11**

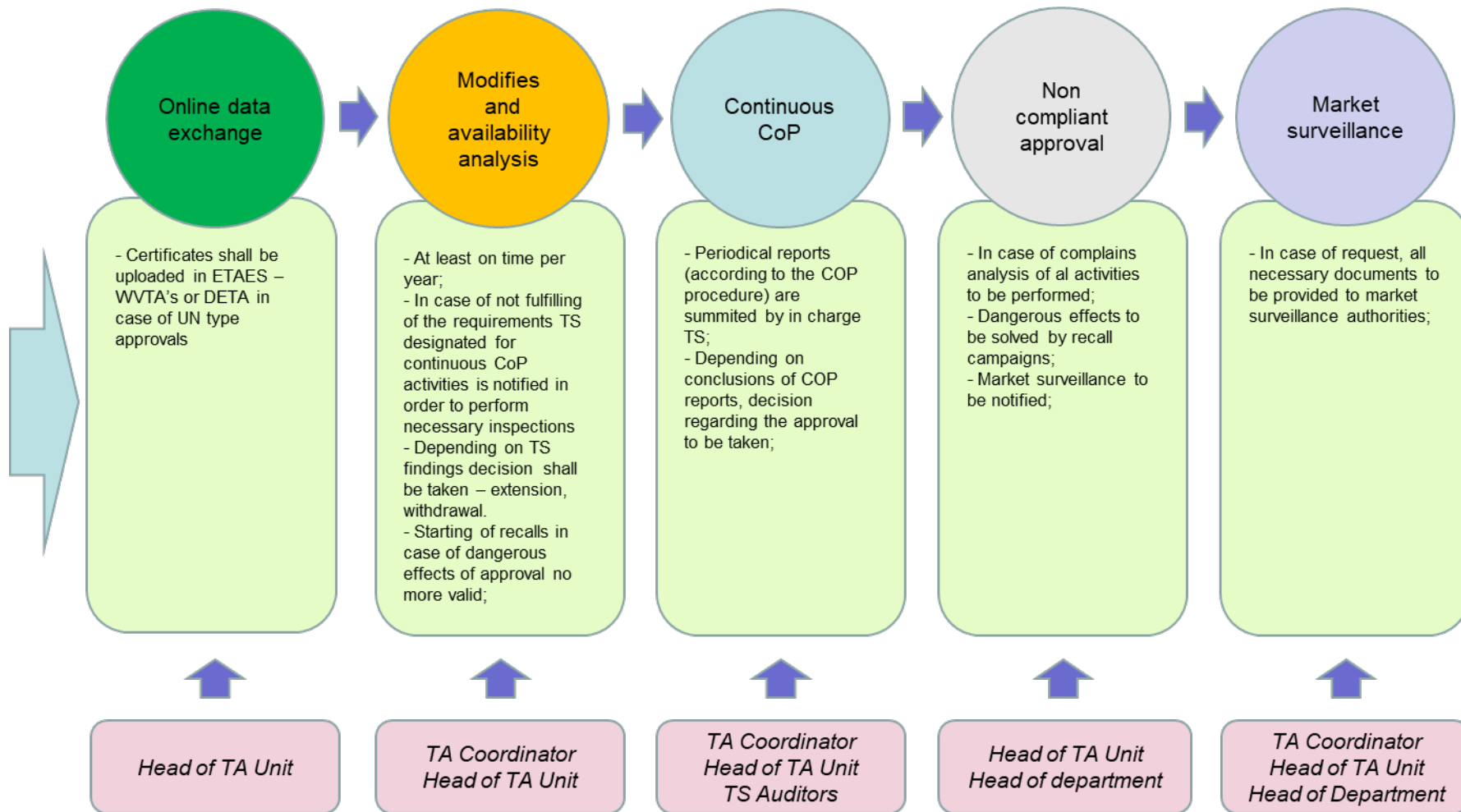
- **Type Approval Procedure**
 - focused on the obligations of all actors involved: manufacturers, their representatives, the type approval authority and the technical services appointed to carry out the approval tests;
 - administrative activities and associated documents, respectively the application letter for approval, the information file, the document regarding the selection of the worst case, the communication with the decision regarding the type approval (granting, revision, extension, refusal or withdrawal);
 - to keep under rigorous control the harmonized numbering system for type approval certificates;
 - exceptions granted for new technologies and the cases in which the virtual test methods are accepted.
 - mandatory sequences of the approval process and the corresponding activities.
 - positions from the organisational structure responsible for carrying out different activities.





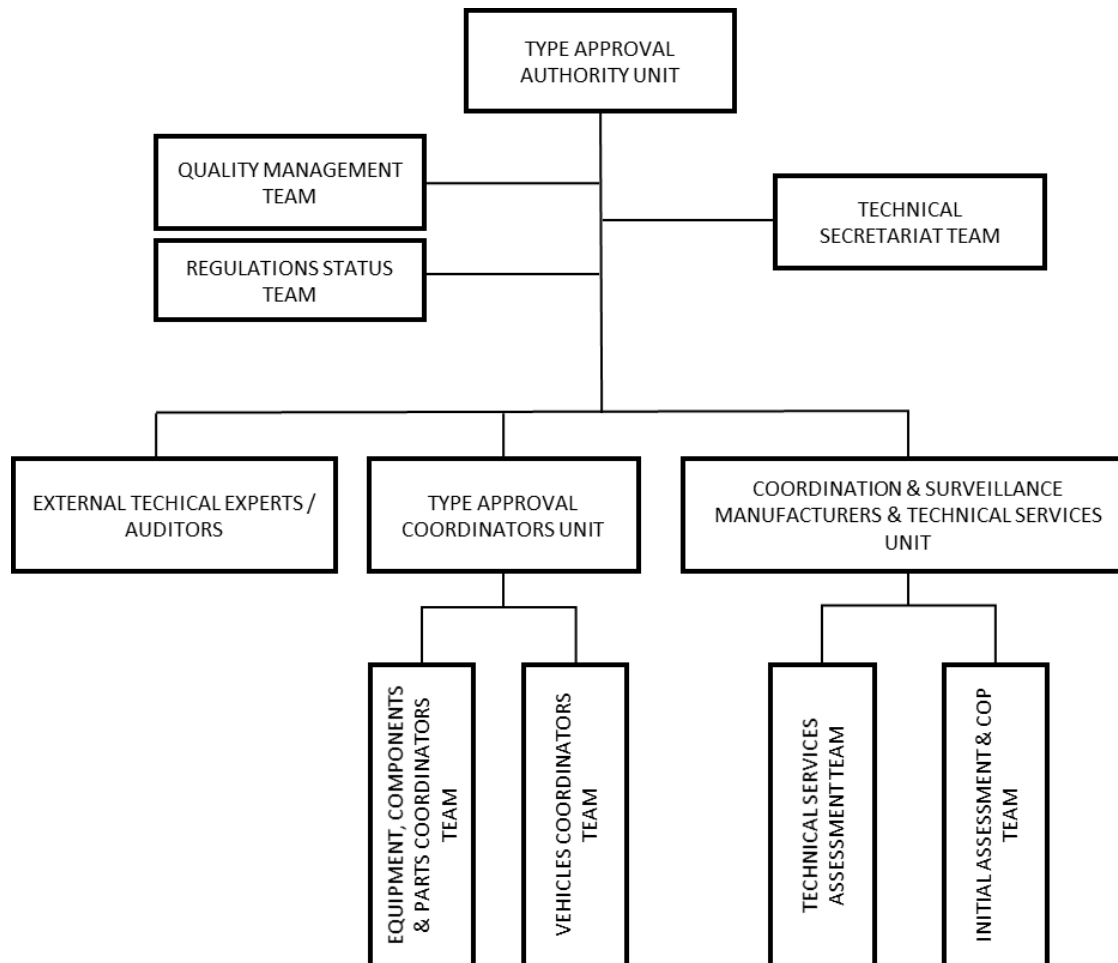




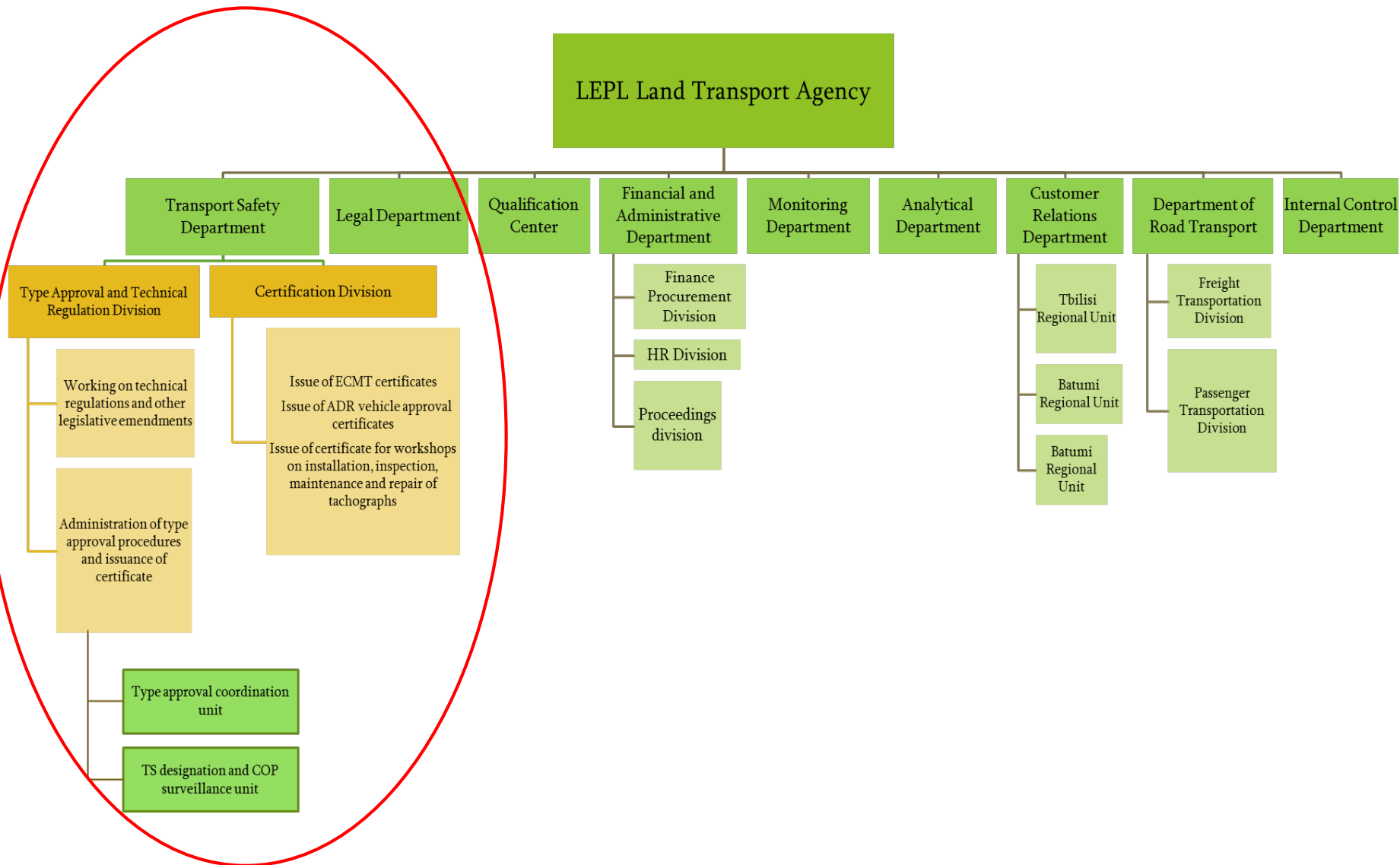


Type Approval Unit Organizational Structure

- Important to respect the principles of independence, impartiality and confidentiality as well the cooperation with other authorities;
- Based on preliminary information, it was proposed a general version of the TAA organizational structure that include the entities responsible for the specific activities;



- the LEPL-LTA working group presented their future working structure;
- the UN consultant proposed an updated version by adding two specific units.



Initial assessment of the manufacturer and Conformity of Production process

- the variants for carrying out the initial assessment process:
 - by the TAA in charge;
 - by a designated TS;
 - by another Contracting Party approval authority, in this case, the issue of a declaration of conformity is required.

- verification of the implemented quality management system is mandatory, therefore the clauses of the ISO 9001, ISO/TS 16949 and ISO 19011 standards must be verified.

- verification of the existence of adequate arrangements and documented control plans, to be agreed with the manufacturer for each approval.

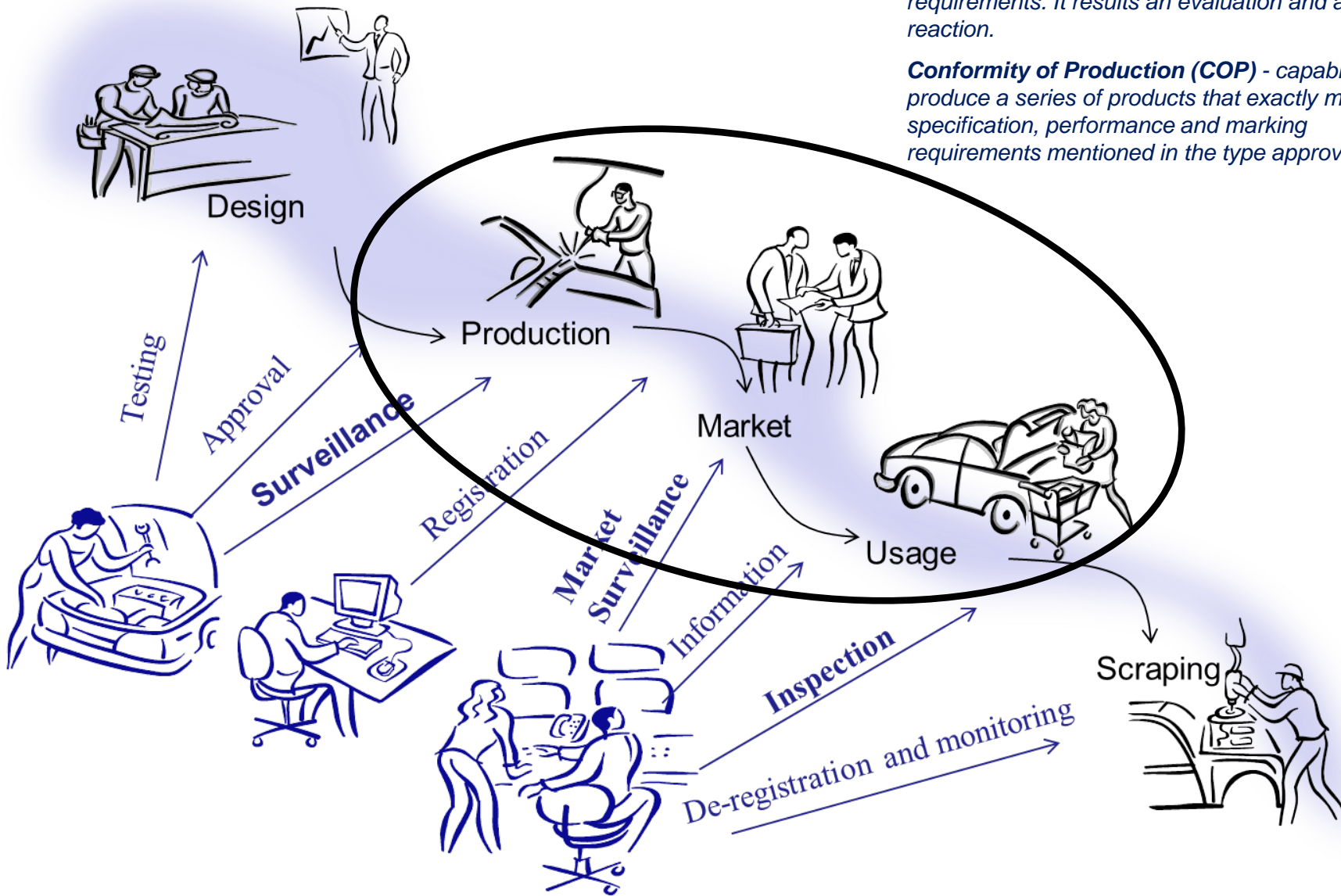
- carrying out, at specified intervals, the tests or associated checks necessary to verify the continued conformity with the approved type, including, specifically, where applicable, tests specified in regulatory acts.

- The advantages of a risk-based approach based on COP surveillance, and the clauses of ISO 31000 being presented.

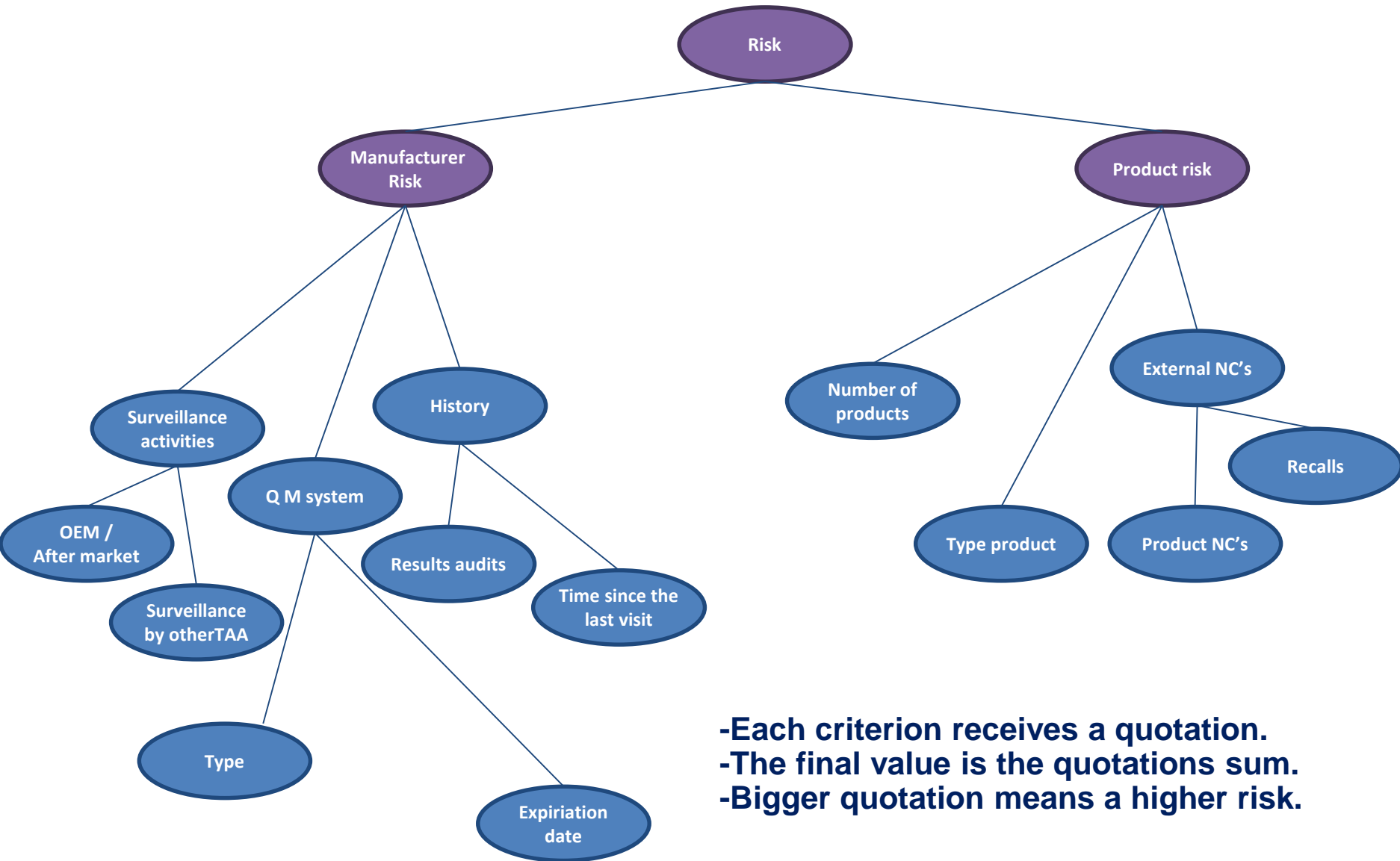
Surveillance in the vehicle chain (RDW source)

Surveillance - process of gathering information about whether a product meets the relevant requirements. It results an evaluation and a reaction.

Conformity of Production (COP) - capability to produce a series of products that exactly match the specification, performance and marking requirements mentioned in the type approval.

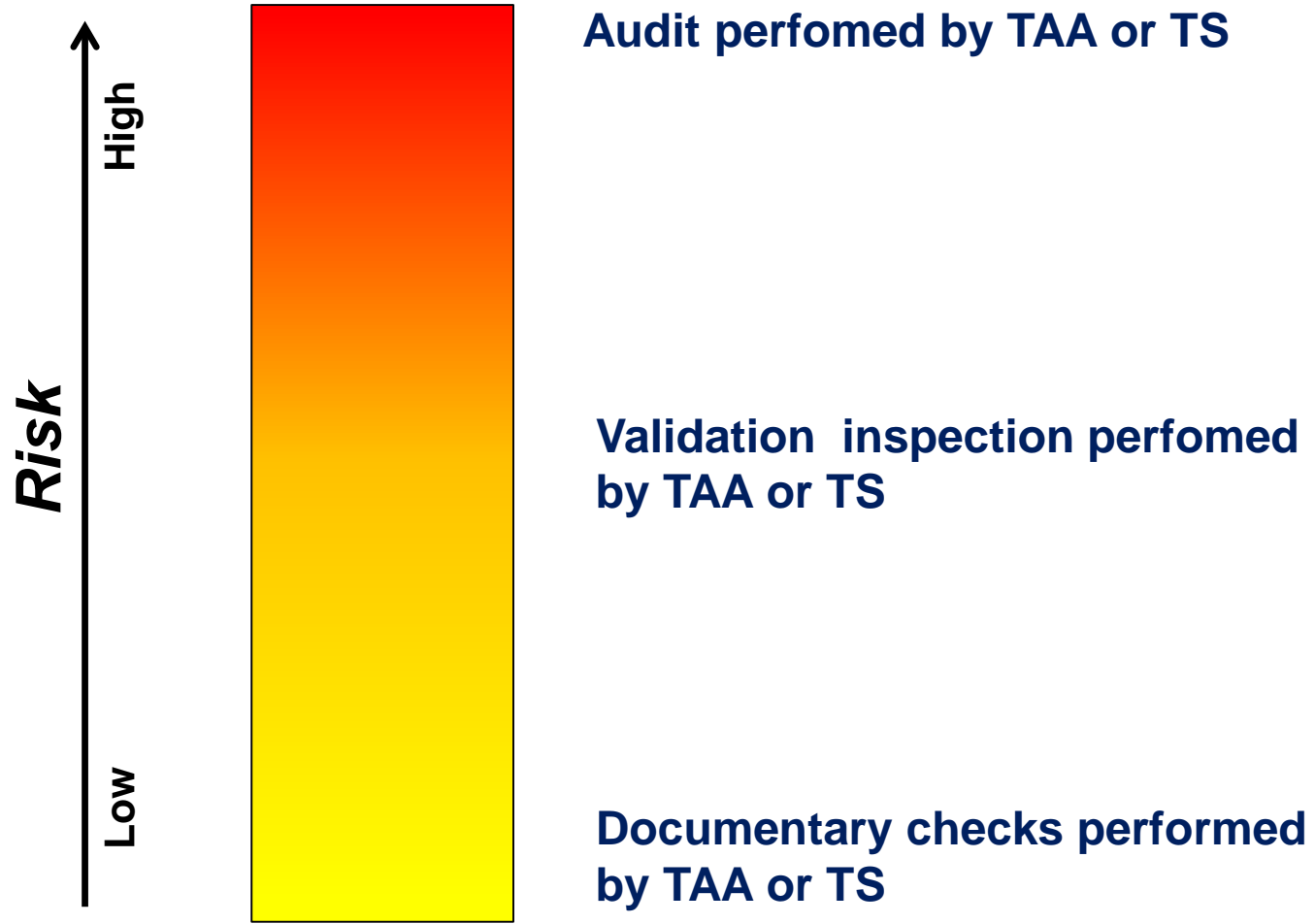


Risk-based COP surveillance algorithm example



- Each criterion receives a quotation.
- The final value is the quotations sum.
- Bigger quotation means a higher risk.

Risk-based actions prioritization



Audit performed by TAA or TS

Validation inspection performed by TAA or TS

Documentary checks performed by TAA or TS

Technical Services assessment

The technical services shall be designated according to one or more of the four following categories of activities, depending on their field of competence:

- (a) **Category A:** Technical services which carry out the tests referred to in UN Regulations in their own facilities – QMS ISO 17025;
- (b) **Category B:** Technical services which supervise the tests referred to in the UN Regulations, performed in the manufacturer's facilities or in the facilities of a third party - QMS ISO 17020;
- (c) **Category C:** Technical services which assess and monitor on a regular basis the manufacturer's procedures for controlling conformity of production – QMS ISO 17021;
- (d) **Category D:** Technical services which supervise or perform tests or inspections in the framework of the surveillance of conformity of production.

The logo for Applus+ IDIADA, with 'Applus+' in brown and 'IDIADA' in orange.The logo for UTAC, featuring the letters 'UTAC' in blue with a stylized swoosh above the 'C'.

TS attributes

**Appropriate
skills**

**Specific
technical
knowledge**

**Proven
experience**

**Free from any
control and
influence**

**With
resources**

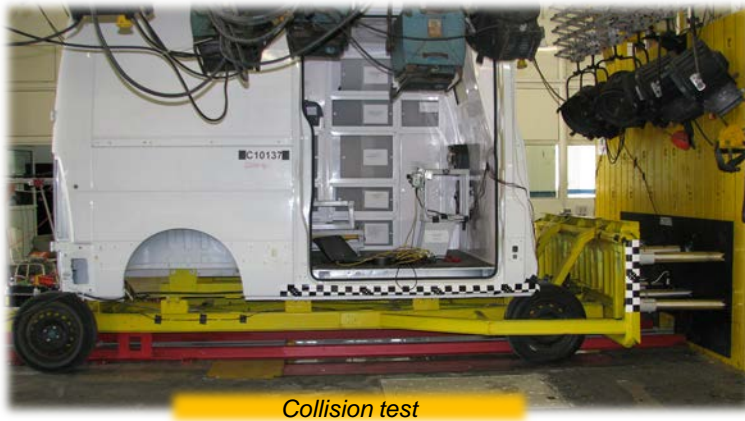
Impartial

**With access to
the test
facilities and
measurement
devices**

The main components of the technical services assessment taking into account the processes required by Schedule X of the UN 1958 Agreement and the EU framework Regulations are:

- Principles of assessing (audit, recognition, capability range);
- Auditor skills;
- Resource review;
- Preparation for assessment;
- On-site assessment;
- Analysis of findings and assessment report;
- Granting/confirming a designation;
- Reassessment and surveillance;
- Records on designated technical services;

Tests examples by



On-the job training

- held for five days in Bucharest, by the Type Approval Department of RAR;
- four LEPL-LTA specialists participated;
- two days were dedicated to the activities related to the TAA;
- two days were dedicated to the activities related to the TS;



Conclusions – the level of implementation for the first phase of Action Plan

Activity	Description	Status
Prepare the type approval legislation	Law on Motor Transport	✓
	Technical Regulation	✓
Adopt the type approval legislation	Law on Motor Transport	✓
	Technical Regulation	entry into force end of 2023
Define the internal structure of the TAA	The organisational chart of the type approval and technical regulation division of LEPL-LTA must be defined	✓
Train the LEPL-LTA coordinators and auditors	LEPL-LTA specialists must be trained according to QMS: ISO 9000 – manufacturer initial assessment; ISO 17025 – TS category A; ISO 17020 – TS category B, D; ISO 17021 – TS category C;	scheduled for the October 2023
	LEPL-LTA specialists must be trained to coordinate the type approval files. (training-on-the job method)	✓ Done in week 39
Prepare the type approval procedures	The LEPL-LTA specialists received the process steps for the development of internal type approval procedures	✓ during the project
Continuous participation in the WP.29 Expert Groups	Dedicated Expert Groups of WP.29 are very important sources of information in the process of developing the technical requirements	in progress
Technical Services identification	Identify international TS, already notified for category A and/or B by another Contracting Party. Establish the conditions for cooperation.	in progress
LEPL-LTA notification to the UNECE Secretariat	In order to be official recognize as TAA, a notification of the LEPL-LTA to the UNECE Secretariat is mandatory	Official letter sent
Technical Services designation and notification	Assess, designate and notify the Technical Services for which cooperation agreements were concluded.	in progress
Start the type approval activities	Together with the Technical Services, start the type approval activities for the identified customers.	in progress

Recommendations



In the Legislation area

- In the text of Technical Regulation, it is recommended to introduce a new item that emphasizes the need to ensure at the level of the Approval Authority a sufficient number of qualified personnel to carry out the activities of coordination and evaluation of the approval files. The approval coordinators must have thorough knowledge of the technical fields of the UN Regulations that they manage and, at the same time, they must have knowledge of the administrative procedures required by the UN 1958 Agreement and its Schedules.
- It is recommended to insert in the Georgian Technical Regulation prescriptions establishing the default recognition of designations made by other Contracting Parties for accredited Technical Services, by presenting the evaluation and designation reports for the regulatory domains assessed. This practice is used in the EU legislation and helps to not repeat already performed steps in the Technical Service Assessment.
- In addition, it is recommended that the Approval Authority delegate part of the procedural tasks to the Technical Service, including the relationship with the manufacturer or the technical decisions regarding the conformity of the products tested and subject to homologation.

In the Enforcement area



- the adaptation of the organizational structure of the LEPL LTA is a very important action leading to an efficient implementation of the specific activities managed by the type approval authority. The type approval process, the designation of technical services, the initial evaluation of the manufacturers, and the conformity of production assurance are chapters that must be coped and managed by the type approval authority.



- it is recommended that the organizational structure of the Type Approval and Technical Regulation Division from LEPL LTA to have distinct units for coordination of the approval files and for the TS designation and COP surveillance. The coordinators must have deep technical knowledge in the engineering automotive field while for the TS designation and COP activities are recommended auditors trained to apply the prescriptions from the quality management standards.

In the Education area



<https://www.isotraining.co/>

- the type approval authority personnel must be constantly trained and adapted to face the dynamics of the technical requirements and the challenges of technological developments.
 - participate in the expert groups of WP29 - World Forum for Harmonization of Vehicle Regulations;
 - collaborate with experienced technical services;
 - initial and continuous training of auditors and experts supervising the technical services and production conformity is mandatory (ISO 17020, ISO 17021, ISO 17025);
 - participate in on-the-job trainings, possibly with the help of other approval authorities.

In the Technology area

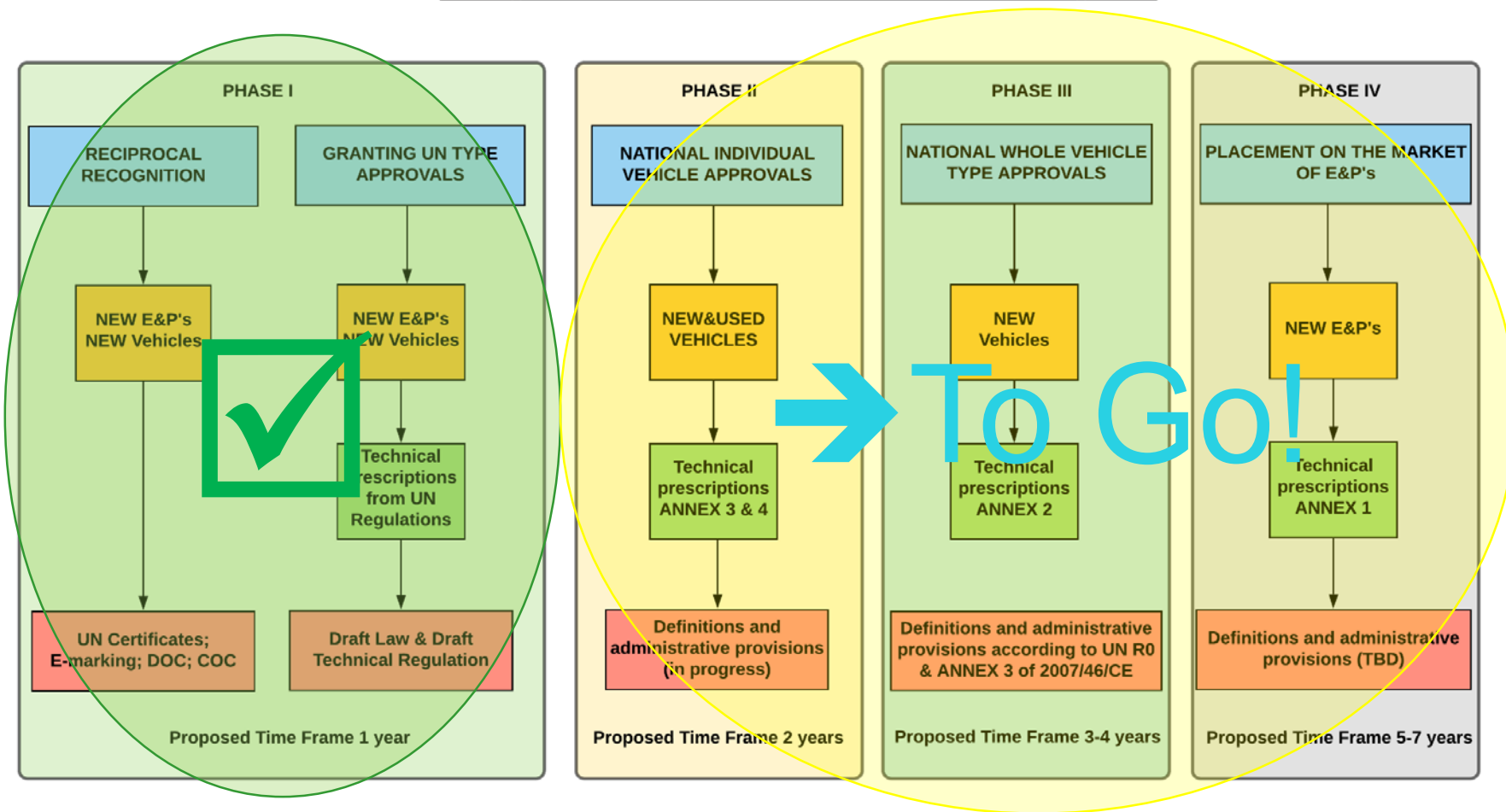


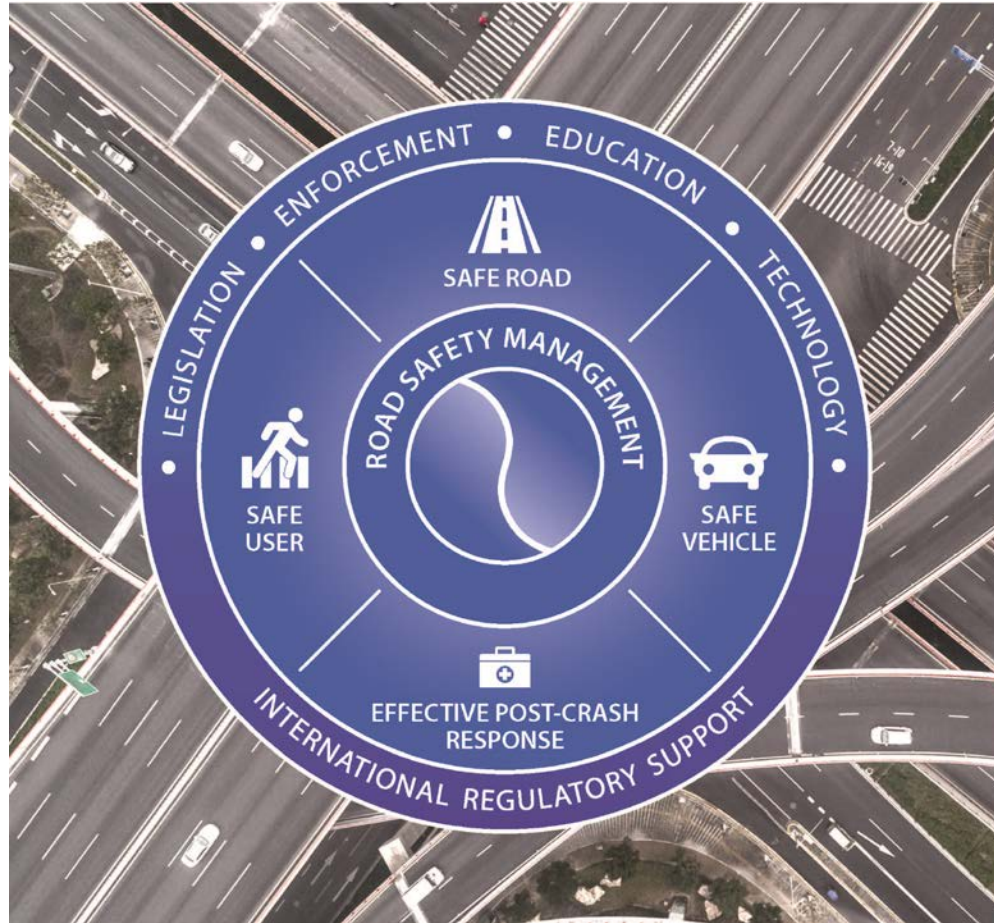
- the procedural steps provided by the UN 1958 Agreement for the deployment of type approval activities are rigorous and must be strictly followed and respected. The approval coordinators must ensure that these steps are respected, check the traceability of the documents in the approval folder, and permanently exchange information with the manufacturers and technical services. In order to manage these activities more easily
- it is recommended to develop and implement an online IT system used in common with the technical services and the manufacturers for the exchange of documents and technical information.

Further steps in the implementation plan

Action Plan Appendix 1

ACTIVITIES RELATED TO 1958 AGREEMENT IMPLEMENTATION
for GEORGIA





Thank you!