Economic Commission for Europe
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World Forum for Harmonization of Vehicle Regulations
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Item 10 (b) of the provisional agenda
Amendments to Regulations on Gas-Fuelled Vehicles:
UN Regulation No. 110 (Compressed Natural Gas and Liquified Natural Gas vehicles)

Proposal for Supplement 3 to the 03 series of Amendments to
UN Regulation No. 110 (Compressed Natural Gas and
Liquified Natural Gas vehicles)

Submitted by the expert from the European Association of Automotive Suppliers *

The text reproduced below has been prepared by the expert from the European Association of Automotive Suppliers (CLEPA). Various options that fulfil the marking requirements of E-Marking are proposed, while avoiding duplication when more than one UN Regulation applies as is the current case of UN Regulation No. 107. A reduced-size E-Marking is also proposed as in the current cases of UN Regulations No. 67 and No. 158. The proposal is particularly relevant for small-size components. The modifications to the current text of the UN Regulation are marked in bold for new or strikethrough for deleted characters.

* In accordance with the programme of work of the Inland Transport Committee for 2024 as outlined in proposed programme budget for 2024 (A/78/6 (Sect. 20), table 20.5), the World Forum will develop, harmonize and update UN Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.
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.”

Annex 2A, amend to read:

"Annex 2A

Arrangement of the CNG/LNG Component Type Approval Mark

Example 1
(See paragraph 7.2. of this Regulation)

\[
\text{a} \geq 8.5 \text{ mm.}
\]

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 UN Regulation No. 110 under approval number 032439. The first two digits of the approval number indicate that the approval was granted in accordance with the requirements of UN Regulation No. 110 as amended by the 03 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.

Example 2
(See paragraph 7.4.3. of this Regulation)

\[
\text{a} \geq 5 \text{ mm.}
\]

This approval mark when affixed to the CNG and or LNG component shows that this component has been approved in Italy (E 3), pursuant to UN Regulation No. 110 under approval number 032440 and pursuant to UN Regulation No. 10 under approval number 068230. The first two digits of the first approval number indicate that the approval was granted in accordance with the requirements of UN Regulation No. 110 as amended by the 03 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.

The first two digits of the second approval number indicate that the approval was granted in accordance with the requirements of UN Regulation No. 10 as amended by the 06 series of amendments.

II. Justification

1. 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.

2. UN Regulation No. 107 specifically allows different options to fulfil the marking requirements in cases where more than one Regulation applies (e.g. avoiding a duplication of the E-Marking saves space and simplifies the requirement). UN Regulations No. 67 and No. 158 allow a minimum E-Marking size of 5 mm.

3. 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 Nos. 67, 107, 158 to UN Regulation No. 110 and particularly:

   (a) in the case when more than one UN Regulation applies to one component, then the E-Marking is not duplicated (i.e. allow the so-called "Twin Marking");

   (b) the dimension of the E-Marking is reduced to address the limited space of small size components.