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**APPROVAL MARKING IN UNECE REGULATIONS ANNEXED TO
THE 1958 AGREEMENT**

Submitted by the representative of the International Organization
of Motor Vehicle Manufacturers

Note: The document reproduced below has been submitted by the representative of the International Organization of Motor Vehicle Manufacturers (OICA). It is based on informal document No. WP.29-140-8 presented at the one-hundred-and-fortieth session of the World Forum for Harmonization of Vehicle Regulations (WP.29) (ECE/TRANS/WP.29/1056, para. 79).

I. The situation

Current UNECE Regulations annexed to the 1958 Agreement usually require an approval marking, allowing identification of the country having granted approval, the applicable version of the Regulation (e.g. series of amendments) and the approval number.

Such marking requirements apply to systems, components and technical units.

This OICA paper only addresses system marking.

II. Background of system approval marking in UNECE Regulations

The current requirements for system approval marking were introduced in the early stages of the 1958 Agreement framework, with the aim to allow quick and easy identification of approved types and of the applicable UNECE Regulation.

Clearly, such marking requirements were established at a time when the paper documentation process, without copy machines and, last but not least, without modern information technology, was unreliable, burdensome and time-consuming.

III. The problems of system approval marking

While system approval marking had a certain use in the past for easy identification, the situation of today is changed:

- (a) System approval marking generally does not provide any added value to either customers, technical services or authorities. Some exceptions are obviously possible, such as UNECE Regulation No. 24 (diesel smoke) marking requirements.
- (b) System approval marking is a burdensome process, duplicating other modern identification means.
- (c) With current and modern information technology, authorities and technical services can easily check vehicle approval numbers, with all necessary documentation readily available. The system approval number on the vehicle itself is superfluous.
- (d) Several countries, applying a type approval or certification system, do not require system approval marking in their national regulations.

IV. OICA proposal

Bearing in mind the above, OICA submits to WP.29 the request to critically re-examine if in the UNECE Regulations for system approvals additionally to the actual marking a more "modern" alternative could be offered, which has at least the same quality as the current marking. The final decision, if necessary, will be agreed between the relevant authority and the specific manufacturer.

Therefore the following conditions should be considered:

- (a) Scope of the proposal: only system approvals;
- (b) Possibility of the current marking will be kept;
- (c) The way for other possibilities of identification will be opened;
- (d) The quality of the alternative method should be equal or better;
- (e) The best way to amend the current situation must be found.

An example of appropriate wording is indicated below.

If WP.29 accepts this general principle, OICA would endeavour to prepare, for each concerned UNECE Regulation, the necessary amendment proposals; examination of these proposals could then be conducted by the appropriate Working Party. Also a more general approach could be reasonable.

Example

UNECE-Regulation No. 13-H proposed modified text:

- 4.4. There shall be affixed, conspicuously and in a readily accessible place specified on the approval form, to every vehicle conforming to a vehicle type approved under this Regulation, an international approval mark consisting of: (without any change from original text)

and to add a new paragraph:

- 4.9. When it is agreed by Contracting Parties applying this Regulation, instead of an international approval mark as described above, other means of identification, by which the relation between each vehicle and the type approval granted for that vehicle is clearly identified, can be used as an alternative.**

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