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Marking of gtrs and their interaction with the marking of UNECE Regulations

Submitted by the expert from the European Commission (EC)

The text reproduced below was prepared by the expert from the European Commission (EC), recommending steps for the development of a marking system under the 1998 Agreement. A previous proposal on the same subject was reproduced in document ECE/TRANS/WP.29/2007/38.

REVISED VERSION OF THE PROPOSAL AIMING AT COMPATIBILITY BETWEEN GTR MARKINGS AND MARKINGS ACCORDING TO THE 1958 AGREEMENT

1. The following proposal sets out certain recommended steps in relation to the development of a marking system within the framework of global technical regulations (gtrs) under the 1998 Agreement.
2. A distinction is drawn between:
 - (a) markings related to mutual recognition or self-certification; and
 - (b) other information (notably information aimed at the user). Markings related to mutual recognition (e.g., "E" marking) or self-certification (e.g., DoT number) are closely linked to their respective legal frameworks with the result that harmonization of these markings could be extremely difficult. On the other hand, it may be possible and useful to harmonize markings provided by the manufacturer that set out other information (e.g., within the tyre gtr).
3. The suitability and potential for the development of a harmonized system of manufacturer information in gtrs should be examined on a case-by-case basis (i.e., assessment is to be made one gtr at a time). Two gtrs where markings may prove to be useful are safety glazing and tyres. The principles of this proposal could be applied to these two gtrs.
4. As other groups might envisage similar steps, it seems advisable to develop a marking system that:
 - (a) is compatible with other legal marking obligations (e.g., those according to the 1958 Agreement);
 - (b) requires little space; and
 - (c) avoids the unnecessary duplication of markings (it is agreed that if markings are to be considered for some gtrs (e.g., tyres and safety glazing), they should not become additional markings).
5. Three elements may be considered as part of a possible gtr marking:
 - (a) gtr number and its amendment: e.g., "gtr 1 A2";
 - (b) product sub-category and further information: e.g., "snow", "tubeless", dimension, etc.; and
 - (c) manufacturer: "XYZ Ltd." or a manufacturer identification number.
6. The place of the markings related to mutual recognition or self-certification.

In order to benefit from the market value of the gtr markings, these markings should be located in a limited space. However, the place of these markings should be fixed on a case-by-case basis in each gtr.
7. Optional markings

Contracting Parties should have the possibility to make the gtr markings optional for products that are only for their national or regional market. This would avoid burdening

companies which do not export outside the market concerned. On the other hand, products which are marked according to a gtr should be accepted by all Contracting Parties.

8. Next steps

It is suggested that these proposals be used as guidelines by the informal groups working on tyres and on safety glazing. The principles set out in this proposal could be amended in the light of the experience gained through their use in these two gtrs.
