Contracting Parties participating IWVTA Informal Group are invited to answer the following questions hopefully by the end of October, 2016

Name of the Contracting Party: EU

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| Questions | Answers |
| Q1: From the political point of view, would such concept as “Attestation”, “limited type approval”, “special provisions” or whatever called which allows the compliance with most but not all of the technical requirements of the relevant UN Regulation be really necessary? | A1: The European Commission has some doubts regarding the practical benefit of this concept. In fact, under the current (and revised) rules in the 1958 Agreement, only UNECE type-approvals granted in accordance with the latest version of the Regulation will be recognized (Article 12). Therefore, only these approvals may benefit from the mutual recognition principle of the Agreement. Furthermore, the EU plans to use only such approvals for the purposes of EU type-approval and therefore Attestations would have no legal effect in the EU. |
| Q2: Assuming that “Attestation concept” would be really necessary, from the legal point of view, could Schedule 9 “Attestations” be added without reference to the main text of the Revision 3 of the 1958 Agreement? | A2. The concept of Attestation is a new one, which is not covered by the 1958 Agreement. Therefore, a further Revision of the 1958 Agreement would be needed in order to introduce this concept in the core provisions of the Revised 1958 Agreement. A new Schedule on a new concept cannot be added autonomously. |
| Q3: Would it be a practicable approach for Contracting Parties to amend the main text and/or Schedule of the 1958 Agreement in order to introduce “Attestation concept”? | A3. As stated in A1, we do not believe this change is necessary, useful or even desirable and therefore such an exercise does not seem politically appropriate, especially at this stage, when we have just finalized Revision 3 and launched its notification and accession procedure. |

1. Attestation concept (refer to Action item 3 in document IWVTA-SG58-22-01 “Major results and Action items of the 21st SG58 meeting)

2. Diversity of manufacturers (refer to Action item 1 in document IWVTA-SGR0-22-01 “Major results and Action items of the 21st SGR0 meeting)

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| Questions: Is diversity of manufacturers under IWVTA and individual type approvals allowed in the following cases? | Answers |
| Case i): IWVTA is applied by a vehicle manufacturer using type approval of components whose applicant is a supplier. | A for case i): Yes |
| Case ii) IWVTA is applied by a vehicle manufacturer using type approval of a vehicle system whose applicant is its subsidiary company, and vice versa. | A for case ii): Systems are closely linked to a specific vehicle and therefore the manufacturer should be the same for both. |
| Case iii) IWVTA is applied by vehicle Manufacturer A using type approval of a vehicle system whose applicant is Manufacturer B. Manufacturers A and B jointly developed the system. | A for case iii): Also here, it is important to ensure that the vehicle manufacturer is responsible for the whole vehicle and therefore it is preferable that the manufacturer remains the same. This would also ensure clarity when applying Conformity of Production rules. |