



Automotive Lighting  
and Light Signalling Expert Group  
GROUPE DE TRAVAIL "BRUXELLES 1952" (GTB)

IMMA

# Possible approach for harmonisation of marking requirements

# The issue

## The gtr's under the 1998 Agreement

- Contain by definition only technical requirements,
- Do not specify anything on certification process,
- Therefore cannot contain certification marking requirements (administrative marking showing that the product in question meets the gtr)

## ⇒ Consequences:

- **Existing national/regional marking requirements are retained** (UNECE marking, US DOT marking, Chinese CCC marking, etc.) even after transposition of the gtr
- In spite of global technical harmonisation, **products sold on the global market would still need to carry different markings**, even if they strictly meet the gtr requirements

# The different markings

➤ Typically, products may have to bear different types of marking:

**a) *Customer's (= driver's) relevant information* only:**

- Name / trade mark of manufacturer
- Technical characteristics,  
e.g. dimension, material, function, etc.
- Only needed for purchase decision or service/repair



**b) *Administrative certification data***

- Approval system, authority, regulation number, approval number, factory code, ...)
- Only relevant for certification and homologation issues

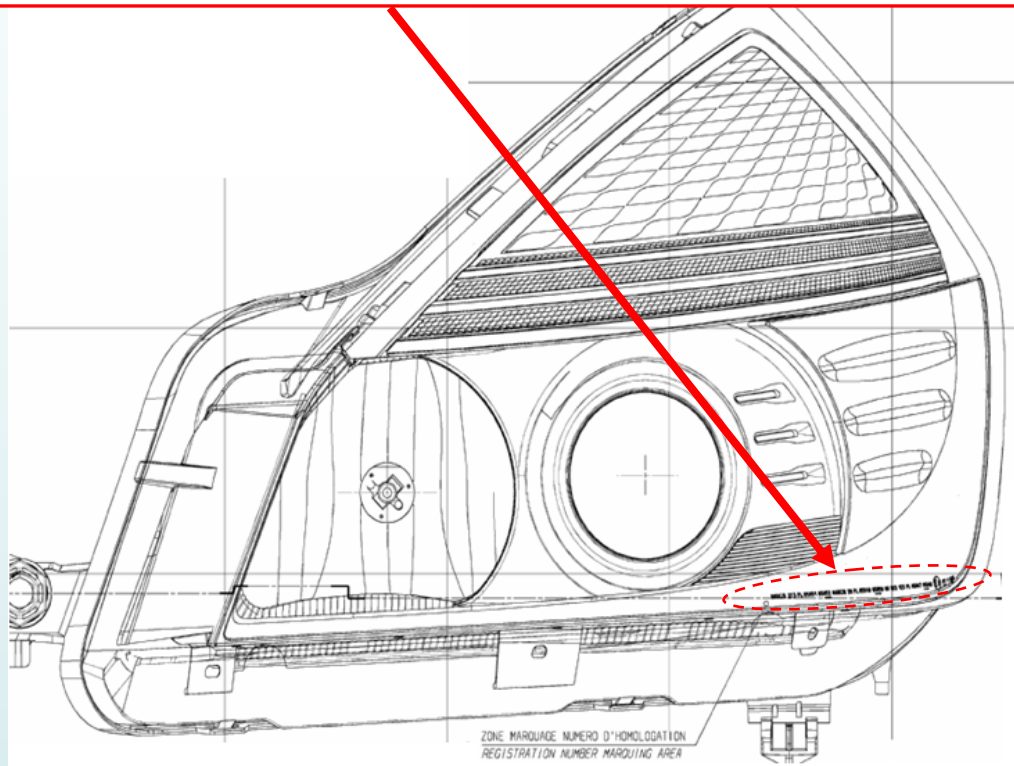


➤ **OICA proposes a stepwise approach to harmonize marking**

# Example of approval marking on lights

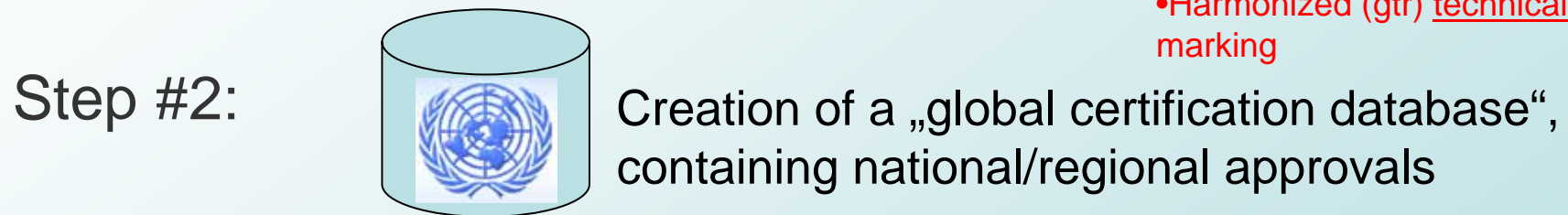
- The legal requirement for markings on lighting equipment has increased to the point where it is difficult to retain their legibility:

00DC/R 27,5 PL 05051 05052 00DC/R 30 PL 05049 05050 00HCR 17,5 PL 05047 05048 E2 01 1 02A

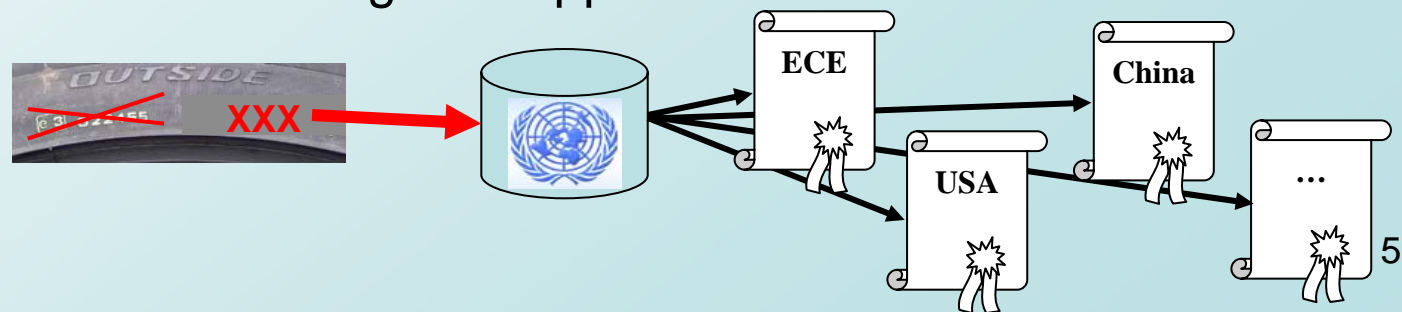


**Note:** If this headlamp incorporated direction indicator, position lamp and DRL, the markings would almost double in size!!

# Principle of the approach

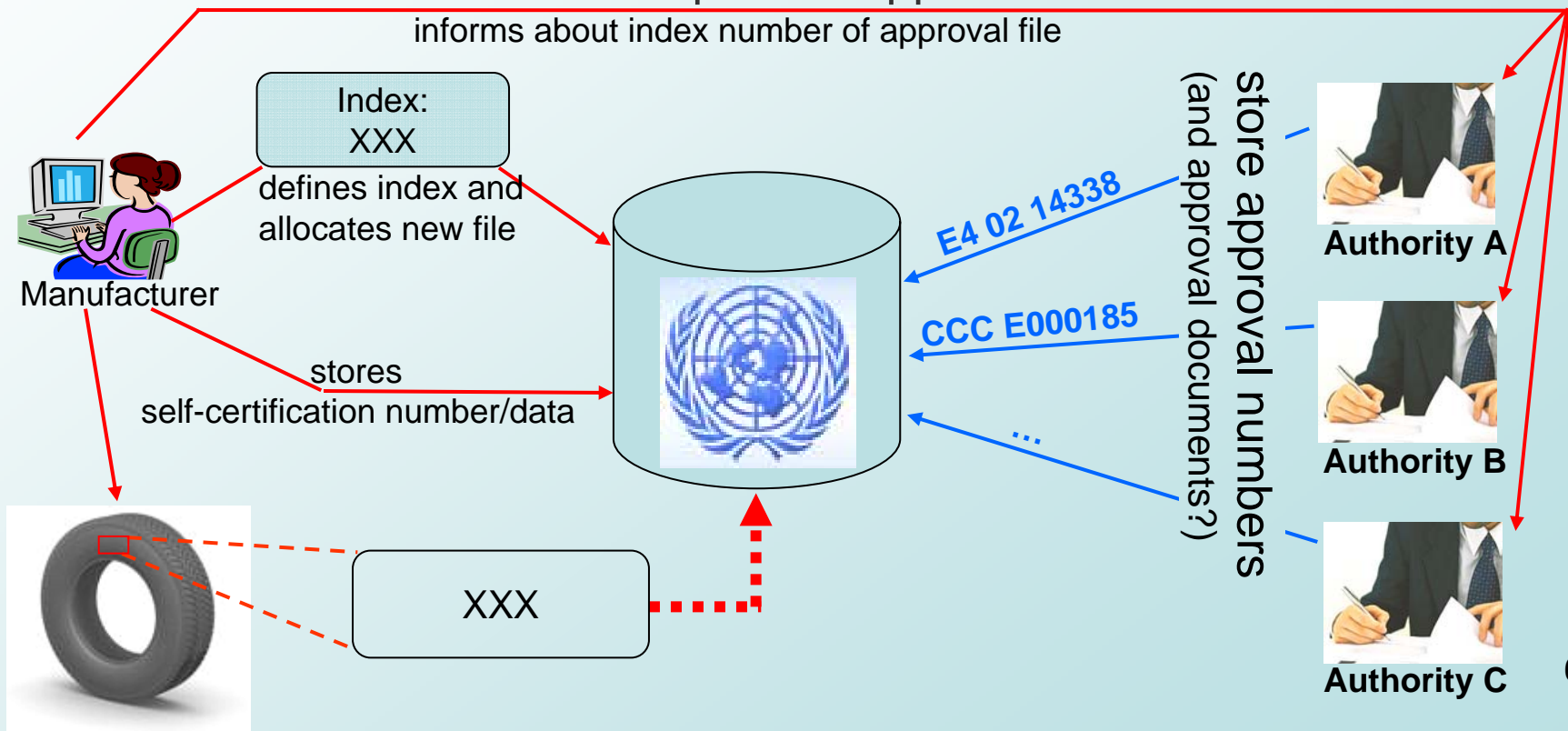


Step #3 .. #n: Gradually replace current approval marks on the product by an index (xxx), referring to the database of the national/regional approvals:



# Usage of the “Global Database”

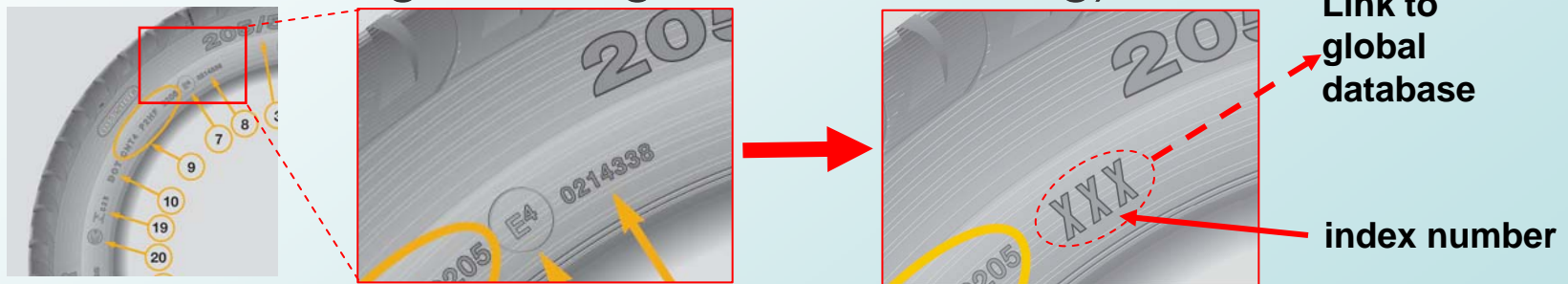
- Unique index number "XXX" specified by manufacturer to identify his product
- Manufacturer allocates a new file with this index in the global certification database and informs authorities about that index in his application documents
- Authorities then store the respective approval numbers in the database



# Resulting changes of marking

(example for tyres)

- After Step #1 (Harmonisation of “technical” marking):
  - No change in “technical” tyre markings – as it is already harmonized
  - Global harmonization of technical marking through gtr’s may be possible and beneficial for other components
- After Step #3 (Global index number gradually replaces current marking, starting with E-marking):



- After Step #n (“Global marking” is accepted worldwide):



# Step 1 - Summary

- gtr: harmonizes requirements on content and layout of marking regarding manufacturer and technical characteristics (i.e. no administrative data):
  - location and height of the text
  - permitted kind of fixing the marking on the component
  - technical characteristics required to be documented by a marking
  - coding of these characteristics in the marking
- gtr, including technical marking requirements, is transposed in the national/regional/58 Agreement regulations
- National/regional administrative certification marking (ECE, US DOT, CCC, ...) remains unchanged for the time being



# Steps 2...n - Summary

Second phase ("administrative" data):

- Creation of a global certification database containing all administrative data / certificates of the component (ECE, USDOT, others)
- Manufacturer determines unique index number XXX for his component
- Authorities store administrative/approval data for component XXX in database
- Current administrative certification marks on component are replaced by XXX

# Advantages of that approach

- The substitution of the various national/regional certification marks by a unique index implies the following advantages:
  - ✓ Smaller marking ⇒ more flexibility in locating the mark
  - ✓ Future additional certifications for the same product are handled in the certification database only
    - ⇒ no additional marking on the component
    - ⇒ no problems with available space
    - ⇒ no expensive stamping tool modifications
- The index number could allow direct read access to all approval documents assigned to the product
- The system is not necessarily limited to 58 or 98 Agreements, i.e. it could become a truly worldwide, unique system if all countries worldwide adhere to it