

An issue has arisen in the implementation of ECER90:02 which requires consideration by GRRF

This paper is for information purposes; it is intended to bring forward a proposal to the 79th session of GRRF

For testing purposes, the regulation permits, under paragraph 2.3.7, the grouping of parts having the same characteristics as a "Test Group" (family)

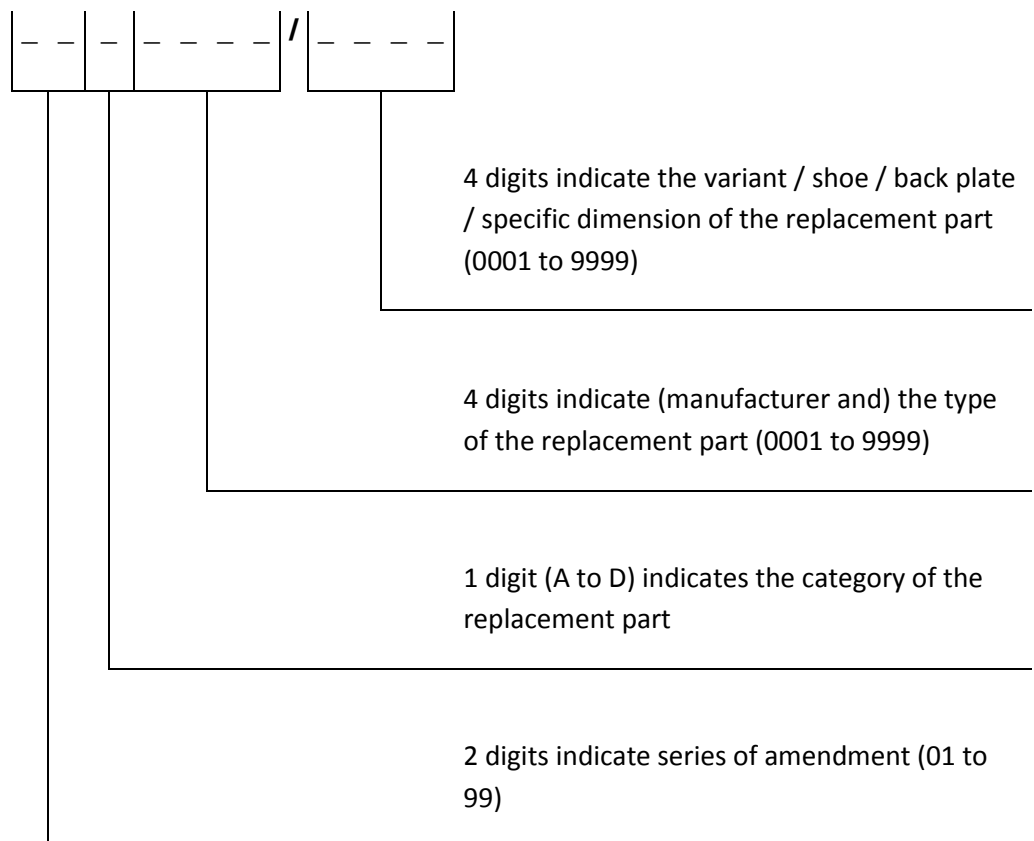
In paragraph 2.3.8 the regulation defines a "Variant" as an individual brake disc/drum within a given test group

The resulting approval number is of the following form

4.2.3. The next four digits shall indicate the manufacture and the type of the brake lining, the type of disc or the type of drum.

A suffix of four digits shall indicate

- (a) the shoe or back plate or specific dimension in the case of drum brake linings
- (b) the variant in the case of a replacement disc or replacement drum



The implications of this are that an approval of a Test Group requires individual certification for each part (variant) within the Test Group with a consequent increase in the administrative burden and the cost to the applicant of securing approval and with no safety benefit to the consumer

This was not the intention of the working group that drafted the extension to ECER90 and is different to what has previously been the case with the approval of brake linings where the approval of all parts contained within a Test Group was covered by a single certificate

It is proposed to try to reconcile this matter