

Type-Approval Procedure

Information System of the German Type-Approval Authority

Directive 2007/46/EC; - System approvals using the multi-stage type-approval procedure (from stage 1)

Query or problem

According to Annex II of the Framework Directive 2007/46/EC, the vehicle manufacturer is a type-differentiating criterion for EC vehicle type-approvals. This means that just one manufacturer rather than several different ones may be named on a vehicle type-approval.

From the first stage of the multi-stage type-approval procedure, base vehicles from different manufacturers are frequently used. It is questionable if a system type-approval may name vehicles from several different manufacturers.

Result

As a general rule, system approvals shall also be granted to just a single vehicle manufacturer. Granting the same system approval to several different manufacturers is not permissible. This applies also to any such system approvals that are granted to manufacturers from the first stage of the multi-stage type-approval procedure.

However, for system approvals of the multi-stage type-approval procedure, in the first stage, the manufacturer may name one or several base vehicle manufacturers in the information package. Overall responsibility for the system approval remains with the manufacturer of each stage. Naming the base vehicle manufacturers in the information package doesn't entail the responsibility of the base vehicle manufacturers for the system approval of manufacturers of the first or any further stage. The sole purpose of such naming is the documentation of the scope of approval for each stage.

Example: Mobile home:

The manufacturer of the first stage uses base vehicles from several different manufacturers. In the first stage he fits each base vehicle with a body which is identical in all main characteristics including passenger seats.

The sole owner of the system approval will be the manufacturer of the first stage. He uses different

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variants (two base vehicle manufacturers = two variants). He describes the base vehicle in terms of the firmness of the seats and seat belt fittings (explicitly or references to system approvals of the base vehicle manufacturers) as well as his company's own superstructure.

Flensburg, 2009-09-23
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