

Information system Type-Approval Procedure

Directive 2007/46/EC

- Granting multi-stage type-approvals for EC small series type approvals and for multi-stage type-approvals in connection with small series type-approvals

Query or problem:

After the Framework Directive 2007/46/EC came into force, there was an increase in the number of applications for the issue of multi-stage type-approvals for EC small series type-approvals and for multi-stage type-approvals in connection with small series type-approvals submitted to the Federal Motor Transport Authority (KBA).

In many cases, applications are submitted by manufacturers who have to-date had little experience with the European type-approval procedure. There is also an increased number of applications submitted by manufacturers of vehicles where special vehicle concepts are to be implemented. Examples are vehicles where novel steering systems are to be retrofitted or new vehicle concepts are to be introduced. The specialised technical solutions required for these often make it necessary to assess these cases on an individual basis. These assessments may extend to both conformity with Framework Directive 2007/46/EC and conformity with individual Directives. The result of these assessments is not always foreseeable for the applicant. Delayed processing of applications as well as the refusal of applications are all possible.

Result:

The KBA recommends taking the following into consideration:

- The procedure that the applicant is required to follow should be agreed at an early stage with the KBA. This means that the applicant and the technical service commissioned by him should contact the KBA in good time, i.e. before submitting the application documents.
- In case the application involves special issues or if problems arise in connection with the preparation of the application documents, a consultation with the KBA should be requested.
- Only when the general procedure and contents of the application documents have been agreed beforehand will it be likely that the KBA is able to maintain the usual processing times for the special issue cases mentioned here.
- The KBA cannot guarantee that approvals will be granted in good time if incomplete application documents are submitted or where agreed issues have been ignored. Aside from likely delays in those cases, there is also the possibility that the approval applied for will be rejected.

By taking these issues into account, the applicant can help the type-approval to be processed within the timeframe envisaged and according to the contents requested by him. This will make the approval procedure overall more predictable for the applicant.

Flensburg, 2009-12-07
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