

Type-Approval Procedure

Information System of the German Type-Approval Authority

Directive 71/320/EC and ECE Regulation No. 13; - Fitting of a secondary coupling device on category O1 trailers without braking system

Query or problem

According to Annex I, No. 2.2.2.1 of Directive 71/320/EC, category O1 trailers do not require to be fitted with a service braking system. According to the requirement for all trailer classes set out in Annex I, No. 2.2.2.9 the trailer must be able to stop automatically in case the coupling separates when the trailer is in motion. Single-axle trailers with a total weight of up to 1.5 t (O1 and O2) do not have to fulfil this requirement of being able to brake independently provided that a secondary coupling device is fitted (chain, cable etc.), which ensures that the trailer drawbar does not come into contact with the road in the event of separation of the main coupling.

In line with the longstanding interpretation of the KBA (also backed by explanation 41 on section 41 StVZO, German National vehicle safety standard) category O1 trailers without a braking system are not required to be fitted with an additional secondary coupling device. Other member States do however require trailers without a service braking system device to be fitted with an additional secondary coupling device as well.

There have been cases where such trailers were granted EC type-approval according to Directive 2007/46/EC but have not been granted registration in other member States. The procedures of Directive 2007/46/EC to be applied in those cases are lengthy and protracted. This is also true for the current deliberations taking place in the ECE. Approval holders do however require a swift solution to their approval issue.

Result:

Neither Directive 71/320/EC nor ECE Regulation No. 13 provide unequivocal guidance as to whether or not there is a legal requirement for unbraked category O1 trailers to be fitted with a secondary coupling device. Moreover, no clear-cut practical solution that benefits increased roadworthiness appears to be currently achievable in a consistent manner. However, to ensure a smooth registration process of these trailers in other member states, fitting said secondary coupling device is recommended.

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The process of granting of EC type-approval for category O1 trailers will remain unchanged. Type-approvals will be granted for vehicles without a secondary coupling device.

In respect of component approvals including coupling brackets according to ECE Regulation No. 55, the requirements arising from section 1.5. Annex 5, must be met. Currently these apply to the attachment points for wire ropes of braked trailers.

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