

## Type-Approval Procedure

### Information System of the German Type-Approval Authority

#### Transitional arrangements for the application of the amending Regulation (EU) 2018/1832

##### - Revision 1 -

##### Question or problem:

The Regulation (EU) 2018/1832 builds on the technical requirements of the Regulation (EU) 2017/1151. Existing test procedures have been reviewed and requirements such as evaporation emissions (EVAP), in-service conformity (ISC) and the on-board fuel consumption meter (OBFCM) have been added.

The European Commission has published transitional and grandfathering provisions with the letter GROW.C.4/PD dated 11/10/2018 and additional specifications with the letter GROW.C.4/AM/PD dated 16/04/2019. Questions resulting from the Regulation (EU) 2018/1832 and the aforementioned letters on the **extension** of emission type approvals should be handled as follows.

##### Result:

The Regulation (EU) 2018/1832 entered into force on 17/12/2018 and is applicable for all new emission type approvals as from 01/01/2019. Type approvals issued before this date may still be extended in accordance with the Regulation (EU) 2017/1347 until 31/08/2019.

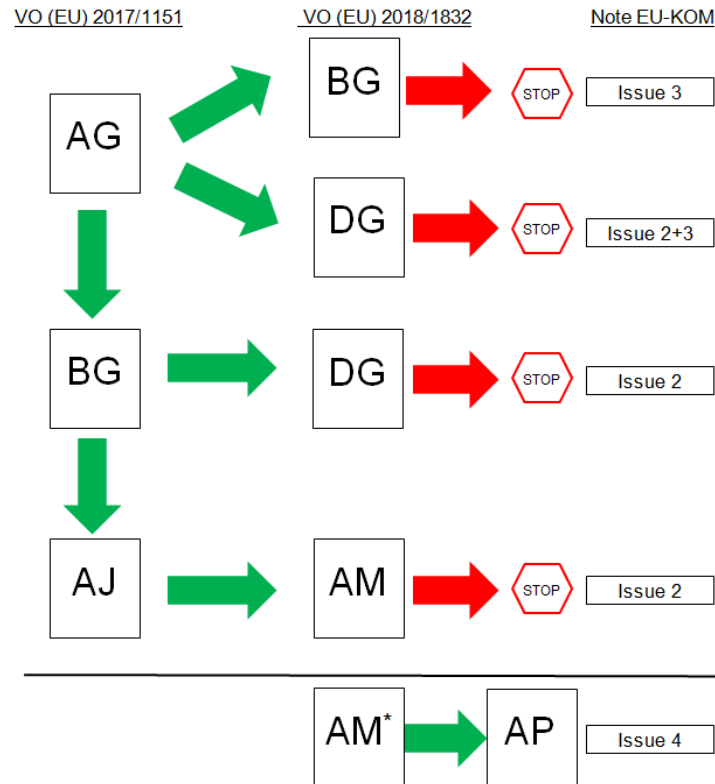
If emission type approvals issued before the entry into force of the Regulation (EU) 2018/1832 should be extended after the entry into force of the Regulation (EU) 2018/1832, the grandfathering provisions of the European Commission letters GROW.C.4/PD dated 11/10/2018 and GROW.C.4/AM/PD dated 16/04/2019 apply.

The simplified paper process in accordance with footnote 3 in particular is discussed in more detail below.

The diagram below shows what changes to the emission letters can be used in the simplified procedure. These stem from "Issue 2-4" of the aforementioned letter dated 16/04/2019 and are exclusively usable for a one-off change to the emission letter. The possible changes are indicated by green arrows. For reasons of clarity, only the possible emission letters for Class M1 and N1 Group I motor vehicles are shown in the graphic below. The derivatives should be reached analogously for other vehicles.

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\* AM to AP extension only possible if the technical service confirms that the existing AM type approval meets all of the requirements of the Regulation (EU) 2017/1151 amended by the Regulation (EU) 2018/1832.

The simplified procedure cannot be used for a changeover to the emission letters AP, AQ or AR because no simplified procedure is foreseen for these emission letters. When applying for emission type approval with these letters, all documents must be adjusted to meet the requirements of the Regulation (EU) 2018/1832.

Skipping emission letters with technical requirements, e.g. from AG directly to AM without applying for an approval with the emission letter DG, means that all documents must be adjusted to meet the requirements of the Regulation (EU) 2018/1832.

Table 1 applies exclusively for **extensions** and defines the **minimum level** according to which the documents in question must be submitted. The second line "Situation with new tests" indicates whether a test has been repeated, e.g. the type 1 test or the real drive emissions test (RDE test). This may be the case if technical changes have been made to the vehicle which result in a re-test. Documents for repeated tests must be drawn up according to the Regulation (EU) 2018/1832. Existing test reports in accordance with the bottom line of table 1 may generally be used, with no time constraint, for an extension in accordance with the Regulation (EU) 2018/1832 in the simplified paper procedure if the emission letters have not changed again. If the emission letters have changed again then the Regulation (EU) 2018/1832 must be complied with in full.

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Application under	Regulation (EU) 2017/1347	Regulation (EU) 2018/1832	Regulation (EU) 2018/1832
Situation with new tests	no/yes	no	yes
Possible changes to the emission letters	AG – AG BG – BG AJ – AJ AG – BG BG – AJ	AG – BG AG – DG BG – DG AJ – AM	in accordance with Regulation (EU) 2018/1832
Information documents	Regulation (EU) 2017/1347	Regulation (EU) 2017/1347	Regulation (EU) 2018/1832
Manufacturer's certifications	Regulation (EU) 2017/1347	Regulation (EU) 2017/1347	Regulation (EU) 2018/1832
Documents on emission strategies (AES/BES)	Regulation (EU) 2017/1347	Regulation (EU) 2017/1347	Regulation (EU) 2018/1832*
Family identifier	Regulation (EU) 2017/1347	Regulation (EU) 2017/1347	Regulation (EU) 2018/1832
Test results in accordance with Appendix VIII (Coca data)	Regulation (EU) 2017/1347	Regulation (EU) 2017/1347	Regulation (EU) 2018/1832
Test report in accordance with Appendix I, Annex 8a	Regulation (EU) 2017/1347	Regulation (EU) 2017/1347	Regulation (EU) 2018/1832
Acceptance of test reports (E.g. ATCT, df, ki, RDE, RL) in accordance with Regulation (EU) 2017/1347	---	yes	yes, with technical service confirmation of equivalence in accordance with Regulation (EU) 2018/1832

Table 1: Version of the documents to be submitted

\*If these cannot be adjusted in form and content for the Regulation (EU) 2018/1832 in good time, then the KBA (Federal Motor Transport Authority) accepts documentation in accordance with Regulation (EU) 2017/1347 until 30/08/2019. Emission type approvals which fall back on such AES/BES documents will be issued with an ancillary clause (annulling the type approval if the AES/BES documentation has not been adjusted to the Regulation (EU) 2018/1832 version by 30/08/2019).

If the application for approval is made in accordance with the version under the Regulation (EU) 2017/1347, the approval number will also be generated in accordance with this version (e.g. e1\*715/2007\*2017/1347AG\*9111\*01). For an application in accordance with the version under the Regulation (EU) 2018/1832 the approval number will be generated in accordance with this version (e.g. e1\*715/2007\*2018/1832DG\*9111\*01), even if the simplified paper procedure is used.

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#### Example case 1:

An emission type approval was issued in accordance with the Regulation (EU) 2017/1347 with the letters AG before 17/12/2018. An application for extension in accordance with the Regulation (EU) 2018/1832 with the letters DG is submitted after 17/12/2018. Fresh testing of matters already evaluated in accordance with the Regulation (EU) 2017/1347 (e.g. driving resistances or RDE) is not required if there are no changes which have an impact on the existing test results. All of the documents listed in the table can be submitted in accordance with the version under the Regulation (EU) 2017/1347. Only the test documents relating to EVAP and ISC are newly drawn up and must be submitted in accordance with the provisions of the Regulation (EU) 2018/1832. For the next amendment with changes to the emission letters, all documents must be submitted in accordance with the version under the Regulation (EU) 2018/1832.

#### Example case 2:

An emission type approval was issued in accordance with the Regulation (EU) 2017/1347 with the letters AG before 17/12/2018. An application for extension in accordance with the Regulation (EU) 2018/1832 with the letters DG is submitted after 17/12/2018. Fresh testing of matters which have already been evaluated is required (e.g. real drive emissions, type one test). Documents which concern the RDE or the type 1 test and the test documents relating to EVAP and ISC are newly drawn up and must be submitted in accordance with the provisions of the Regulation (EU) 2018/1832. Documents for tests which are still valid can be submitted in accordance with the version under the Regulation (EU) 2017/1347 provided that the technical service confirms their equivalence in accordance with the Regulation (EU) 2018/1832. For the next amendment with changes to the emission letters, all documents must be submitted in accordance with the version under the Regulation (EU) 2018/1832.

Flensburg, 27/06/2019  
400-27/001#019  
Mario Quade