

Type-Approval Procedure

Information System of the German Type-Approval Authority

IST-04-23 - Dealing with embargo regulations and travel warnings in the type approval procedure

Question or problem:

In addition to the initial assessment, the approval process also includes regular conformity checks. The approval authority must have the right at any time to remove the approved product or to check the procedures used to control the conformity of production. External influences, such as legal requirements (see a) or travel warnings (see b) can mean that these checks are no longer possible.

- a) Legal requirements can set restrictive measures (embargoes) against other states, institutions or persons. In the case of such requirements, the Kraftfahrt-Bundesamt (KBA) checks whether the sanctions affect the type approval procedure and takes them into account when issuing type approvals.
- b) In the event of a travel warning from the Federal Foreign Office (Auswärtiges Amt) that clearly advises people with German citizenship not to enter the country or recommends leaving the country, the KBA will not carry out business trips to this state or region and will not commission other institutions to represent them.

In terms of the effect on the type approval procedure following cases have to be decided:

Case 1: New manufacturers without initial assessment

No initial assessments will be carried out for new manufacturers who are resident in a country for which a travel warning according to b) has been issued.

Case 2: New type approvals or extensions for already initially assessed manufacturers

New type approvals or extensions of type approvals can be granted if the technical services are able to carry out the necessary tests. This also includes the conformity checks.

The granting of new type approvals and extensions takes place in compliance with any legal requirements (see a). Restrictive measures against institutions or individuals must be taken into account.

Case 3 - Existence of type approvals

The existence of the type approval is bound to the possibility of verifiability. It is crucial whether the technical service is able, organizationally and based on its own decisions, to guarantee unrestricted verifications.

Result:

If points a) or b) apply for cases 2 and 3, the KBA asks the technical services to check whether,

- the provision of approval objects (test samples) by manufacturers, for which they have previously created test reports, is no longer given,
- your house does not carry out an on-site inspection,
- your house is no longer willing to carry out the removal of parts for testing,

and if one of the questions is answered with yes, to report the manufacturer concerned to 423@kba.de with reference to this IST.

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