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RSA

# Consultation on Selected Vehicle Components

23 January 2012

Údarás Um Shábháilteacht Ar Bhóithre  
Road Safety Authority

## **Executive Summary**

Throughout a vehicle's life, various components will require replacing due to either wear or accidental damage. For safety, reliability and environmental reasons, it is important that these replacements are fit for purpose and are manufactured to acceptable standards.

The RSA believes the current system for controlling the standard of components, particularly those for vehicles not originally manufactured for the European market, needs to be revised with a view to providing additional clarity on the specific requirements in legislation. Initially the RSA proposes reviewing the regulations on the supply, sale and fitment of certain safety and environmentally critical components. These are brake linings, couplings and exhausts.

In this document, the current legislation affecting motor vehicle components is summarised and proposals on how it will be enhanced for the three components mentioned above are put forward.

The RSA wishes to hear from interested stakeholders including those involved in the manufacture and distribution of vehicle components, road users and other members of the public on the following proposal. Feedback from this consultation may be incorporated into policy development and legislation to address this issue.

## **1. Introduction**

Throughout the life of a vehicle, various components will require replacing, either due to wear or accidental damage. Examples of components which may require replacing include tyres, exhaust silencers, wipers, brake linings, headlights and emission control devices such as catalytic convertors. This consultation document will address the regulations on the supply, sale and fitment of brake linings, couplings and exhaust silencers only.

If the vehicle has been in a collision or has been damaged by floods, replacement body panels or electrical components may be required. Also, supplementary components such as tow-bar couplings and fog lights may be fitted to the vehicle at any stage throughout its life.

There are three main suppliers of vehicle components for the aftermarket - franchise garages, motor factors and online retailers.

Franchise garages generally supply Original Equipment parts (OE, i.e. the same components that were fitted when the vehicle was new). Motor factors and online retailers generally supply OE equivalent components which have been tested against the performance requirements of the original system and perform within specified limits set out in European regulatory acts (EC and UN/ECE). Once certified as approved replacements, these components are identified by 'e' or 'E' markings (see Appendix II for examples of EC and ECE Approval Markings). It is worth noting that many OE components are actually made by the same manufacturer as the approved components for the aftermarket.

However, it is possible to source components that do not meet the performance requirements of OE components or the respective legal requirements of European or National legislation. As a result, there are concerns about the safety, environmental acceptability and reliability of these components.

An initial analysis of this industry shows that the majority of components supplied and fitted to Irish vehicles are of acceptable quality and meet with the specifications of the vehicle when originally manufactured. However, there are concerns that sub-standard components are available in the Irish market place.

## **2. Component Legislation**

There are two sets of regulations that prescribe the standards of replacement components that can be fitted to vehicles. These are our national 'in use' and 'type approval' regulations:

1. Our Construction Equipment & Use Regulations<sup>1</sup> (CE&U) contain general provisions that when 'in use', vehicles and their parts must be maintained in good and efficient working order so that no danger is liable to be caused. Further to this, under the provisions of the Road Traffic Act of 1961, it is illegal to drive a dangerously defective vehicle. The Road Traffic Act (1968) also makes it illegal for a person to supply or offer to supply a vehicle (to be used on the road) which does not comply with the CE&U regulations;
2. EC Type Approval requirements are more prescriptive with regard to the performance and marking requirements that replacement components must meet with in order to be placed on sale or entered into service.

### **2.1 Construction Equipment & Use Regulations**

CE&U Regulations prescribe the requirements for all vehicles and trailers in use in a public place in Ireland. This includes provisions for but not limited to the following: the brake systems, exhaust systems, mirrors, safety belts and side and rear under-run protection. These regulations prescribe the requirements as to the construction, equipment and use of vehicles while being used in a public place. The duties of drivers and passengers are also specified in the regulations.

As well as specific provisions for certain aspects of vehicles, the CE&U also has general provisions requiring that a vehicle is maintained in good and efficient working order and that no danger is likely to be caused.

In essence, this means that any components fitted must be 'fit for purpose'. In relation to vehicle noise, CE&U Regulations require that all vehicles fitted with an engine must have an exhaust silencer that reduces - to a reasonable level - the noise emitted from the engine. This exhaust silencer must not be altered in such a way that the noise emitted is increased.

### **2.2 Type Approval Requirements**

EC Directive 2007/46/EC is the basis of the European Communities Whole Vehicle Type Approval system (ECWVTA) which prescribes safety and environmental standards for the construction of motor vehicles (including cars, buses and goods vehicles) and trailers. EC Directive 2002/24/EC introduced the system of ECWVTA for motorcycles, trikes, quads and mopeds.

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<sup>1</sup> S.I. No. 190 of 1963 - Road Traffic (Construction, Equipment and Use of Vehicles) Regulations 1963

When a vehicle is manufactured to EC type approval standards, certification is issued which enables the vehicle to enter into service in any Member State of the European Union.

ECWVTA also applies to the components, Separate Technical Units and systems designed and constructed for such vehicles. A component such as a tyre or a bulb can be fitted to many different vehicles and so can be approved independently of a vehicle. A Separate Technical Unit (STU) is generally a device that can be fitted to a limited number of different types of vehicles. An example may be a headlamp assembly that can be fitted to several different vehicles. STU approval relates to a particular vehicle, whereas component approval is not vehicle specific. A system is an assembly of devices combined to perform a specific function for a vehicle. Examples of these are braking, emissions, and exhaust systems where the whole system is tested on the type of vehicle being approved for whole vehicle approval. Systems can incorporate components or STUs.

For vehicles that have been subject to ECWVTA, current Irish Road Traffic legislation contains specific requirements with respect to the type approval of components (see Appendix I). The technical and performance requirements that these components are required to meet with are far more prescriptive than the general CE&U and involve components being independently tested at automotive technical services before being placed on sale or fitted to vehicles. Vehicles that are required to be fitted with approved components include European cars built since 1998 and motorcycles built since 2002. Their replacements must also be approved to the same standards (international ECE standards or EC standards) as the original components fitted at vehicle manufacture.

This means that vehicles which were not designed for the European market (e.g. Japanese or American imports) vintage cars or older vehicles including trucks and buses are required to meet with the general provisions of CE&U in relation to their replacement components, and not the more specific component legislation set out in Appendix I.

### **3. Areas for improvement**

As CE&U requirements are more general and do not mandate specific approved standards for components, it raises the likelihood that sub-standard components could be placed on the market and fitted to vehicles. It also means that approved components could be fitted to ECWVTA vehicles, even though this is not legal. From a road safety point of view, this raises concern because the fitment of non-approved or sub-standard components could have an adverse effect on vehicle safety or the environment.

In order to curtail the possible supply and fitting of non-approved or sub-standard components to the national fleet, the RSA is proposing initially that three categories of components are selected for further consideration due to their direct impact on safety and the environment. These components are:

- Brake linings – Poor quality brake linings may fail or underperform in an emergency situation;

- Coupling devices – A poorly designed or manufactured coupling which fails may result in catastrophic consequences for the vehicle driver and other road users;
- Exhaust silencers – Replacement exhaust silencing systems which do not perform in line with the vehicle's original specifications may cause excessive noise pollution.

It is now proposed to introduce more stringent requirements into Irish legislation to control the sale, supply and fitment of these three components. In the future, additional components may be considered for inclusion in this legislation.

#### **4. Proposal**

In order to ensure that all brake linings, exhaust silencers and coupling devices placed on the market and fitted to vehicles meet with acceptable standards and are fit for purpose, it is proposed that these components shall either be OE parts or approved replacements to either the EC/ECE standards bearing an 'E' or 'e' mark. Irish legislation will be amended to provide improved control on the sale, supply and fitment of these three components. This requirement will apply to all components irrespective of whether the vehicle has ECWVTA or not and therefore will apply to components for all vehicles regardless of their origin. It will apply to all motor vehicles including cars, buses, goods vehicles, motorcycles and trailers. Appendix II has more details on 'e' and 'E' marks.

Initial findings indicate that OE or approved parts are readily available for replacement exhaust silencers, brake linings and coupling devices for all vehicles in Ireland's fleet including those that originated in Japan and Asia, the US etc. There may be exemptions from these requirements, for example, for older vehicles. However, the components placed on the market for such vehicles should meet with alternative marking and packaging requirements.

All other components shall continue to meet with the current CE&U requirements that they are fit for purpose and safe. Furthermore, where component legislation so requires (Appendix I), relevant components and separate technical units must be approved in order to be fitted to new EC vehicles or placed on sale or fitted as replacements.

It is intended that the Road Traffic Act of 1961<sup>2</sup> will provide the primary legislative basis for new regulations and offences which will be introduced as a result of this consultative process. There are other Irish regulatory acts currently in law which protect the interests of Irish consumers from unfair commercial practices and regulate the quality of goods sold by retailers. Examples of these regulatory acts include the Sale of Goods and Supply of Services Act 1980<sup>3</sup> and the Consumer Protection Act 2007<sup>4</sup>. The applicability of the Consumer Protection Act's provisions on misleading and prohibited commercial practices regarding motor vehicle components sold to Irish consumers would be enhanced by the introduction of new regulations mandating certain approval marking and packaging requirements.

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<sup>2</sup> Number 24 of 1961

<sup>3</sup> Number 16 of 1980

<sup>4</sup> Number 19 of 2007

A summary of the proposed changes are as follows:

#### **4.1 Brake lining assemblies**

A brake lining assembly is the component which provides the friction force required in order to slow down or stop a vehicle by making contact with the disk or drum. It includes brake pads and brake shoes. It is essential that the brake linings are manufactured from a robust, heat-resistant material that provides a sufficient level of friction in order to give effective and reliable vehicle braking. It is also essential that they do not contain asbestos.

For safety reasons, replacement brake linings should perform in line with the original brake linings fitted to the vehicle when it was manufactured. In order to ensure this consistency of brake performance, all replacement brake linings including brake pads and brake shoes placed on sale shall either be:

- OE and be labelled with the vehicle manufacturer's part number or;
- Approved to EC standards and carry an 'e' mark or ECE standards with an 'E' mark as replacement brake linings (for the vehicle type).

This will apply regardless of the origin of the vehicle. Appendix III has more details on the standards that are applicable.

Feedback from the consultation may show that OE brake linings or approved replacements are not available for vehicles manufactured or registered before a particular date. If this is shown to be the case, these vehicles may be exempted from the requirements but it will be necessary to mandate additional labelling on the packaging for their brake linings. For example, additional labelling could be prescribed to state words such as "Only for vehicles pre-1970".

#### **4.2 Exhaust silencers**

Excessive noise seriously harms human health and can disturb sleep, cause cardiovascular and psycho-physiological effects, reduce performance and provoke annoyance and changes in social behaviour. The World Health Organisation (WHO) claims that traffic noise harms the health of almost one in three people and estimates that at least one million healthy life years are lost every year from traffic-related noise in western Europe<sup>5</sup>.

For environmental reasons, replacement exhausts should perform in line with the original exhaust fitted to the vehicle when it was new. It should reduce the engine sound to the same sound level as when the vehicle was manufactured in order to minimise contributions to noise pollution. Therefore, it is proposed that every exhaust silencer placed on the market for motor vehicles and motor cycles shall be either:

- An OE exhaust silencer (fitted as part of the original system) or;
- It must be type-approved as a replacement for that vehicle type and be 'E' or 'e' marked.

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<sup>5</sup> [Burden of disease from environmental noise. Quantification of healthy life years lost in Europe](#) - WHO publication, ISBN 978 92 890 0229 5

In addition, the stationary noise level of a replacement exhaust may not exceed by more than 3 dB(A) the reference value when the vehicle was originally approved/ manufactured.

Exemptions may be required for certain vehicles as it could be difficult to source approved exhausts, for example, for motor vehicles which were registered before 1970, motorcycles registered before 1985 and vehicles which are not for road use (for example racing vehicles or off-road quads). However, exhaust components placed on the market for exempt vehicles shall be labelled and packaged accordingly and only be fitted to appropriate vehicles.

Appendix III has more details on ECE and EC standards for exhausts and examples of the alternative marking requirements proposed.

### **4.3 Couplings**

Many vehicles including cars, trucks, buses and motorcycles are equipped to tow trailers, semi-trailers and other drawn equipment. Coupling devices including car hitches, light trailer hitches, 5<sup>th</sup> wheel-couplings for trucks etc. are the means of connection between the combination of vehicles or the articulated vehicles. Coupling devices are safety critical components and their failure may result in loss of life, serious injury and property damage.

It is proposed that all coupling devices placed on the market for motor vehicles, their trailers and two or three wheelers (including quads) shall be 'E' or 'e' marked, thereby demonstrating compliance with the requirements of EC Directive 94/20/EC or UN/ECE Regulation 55.01. This will apply to all couplings placed on the market regardless of whether a coupling is a replacement for an existing coupling or whether it is to be fitted to a vehicle or trailer after the regulations come into effect.

Appendix III has more details on ECE and EC standards applicable.

### **4.4 Enforcement**

It is intended that following this consultation, legislation will be introduced which will make it an offence to import, or to offer for sale or supply, replacement brake linings and exhaust silencers that:

- Are not OE components or approved to either ECE or EC standards ('E' or 'e' marked) or;
- Do not meet with alternative marking requirements that may be prescribed (exempt components will have alternative labelling requirements).

It is also intended that it will be an offence to import, or to offer for sale or supply couplings, which are not approved to either ECE or EC standards ('E' or 'e' marked). Further to this, it is intended that it will be an offence to fit non-compliant components to vehicles after the regulations are introduced.

Whilst enforcement of Road Traffic legislation of vehicles used in a public place is a matter for An Garda Síochána, consideration is also being given to how to provide effective market surveillance at points of import, sale and

fitment of these components. The following presents an overview of how the new proposals may be enforced.

#### **4.4.1 Point of sale**

With regard to enforcement at the point of sale, the Gardaí are empowered to enter premises and seize property. Items obtained may be kept, examined and used as evidence in proceedings taken against businesses or individuals.

The National Standards Authority of Ireland (NSAI) can provide support to the Gardaí (or any other group who may be appointed to carry out market surveillance at the point of sale) in order to establish whether or not components placed on the market have appropriate (or valid) approval. The NSAI can interact with other European approval authorities in order to investigate the authenticity of approvals issued and establish the types of vehicles for which particular components have been approved to be fitted.

#### **4.4.2 Point of importation**

Customs can provide control on goods imported into the state. In the area of product safety, the provisions of EC Regulation 765/2008 permit Customs to detain goods at the point of importation pending the outcome of investigations by the relevant market surveillance authority. If the investigating market surveillance authority finds that the goods are non-compliant, the goods can be destroyed. The NSAI can provide support to the market surveillance bodies in order to establish whether or not components have appropriate (or valid) approval. EC Regulation 1383/2003 provides Member States Customs authorities with specific powers to take action in relation to goods infringing an Intellectual Property Right (IPR) such as trademarks, design rights, copyrights, patents, plant varieties, geographical designations or related rights. At the point of importation, Customs can detain goods suspected of infringing an IPR and, where confirmation exists that the goods in question are counterfeit, Customs can seize and destroy them.

#### **4.4.3 Periodic inspection**

The NCT (National Car Test) and the Commercial Vehicle Roadworthiness Test presents an opportunity to examine components which are fitted to vehicles throughout their service life. Coupling devices are an example of a component which, because of their location on a vehicle, can be easily examined at periodic inspection to check that they are type-approved (e/ E marked). However, due to the location of where certain components are fitted on a vehicle and the effects of weathering, for example, it may be difficult to check approval markings. For example it may be difficult to check brake lining markings as dismantling of the brakes may be required due to the positioning of the e/E approval marking, or if the linings were fitted for some time, the markings can become illegible. On the other hand, the braking efficiency of vehicles is measured during periodic inspection and vehicles that do not afford the requisite level of braking for their category, will fail the test.

Similarly the examination of exhaust silencer markings at the periodic inspection may not be practical due to corrosion which may make legitimate markings illegible. However, the NCT does present an opportunity to measure the sound level emitted from vehicles and since April 2010, cars tested are required to have a level of noise no greater than 99dB(A) in order to pass the test. Should a database of vehicle noise at vehicle manufacture be created, the NCT may also present an opportunity to verify that the exhaust silencing

systems fitted to vehicles emit the same level of noise as the vehicle when originally manufactured.

#### **4.4.4 Roadside inspection**

At roadside inspections, the Gardaí have the power to enforce regulations made under the Road Traffic Acts in relation to components fitted to vehicles. The Gardaí are empowered to carry out roadside inspections on all vehicles and trailers using public roads. This presents the Gardaí with the opportunity to ensure that vehicle components fitted have appropriate markings and meet with appropriate performance requirements.

For example, exhaust silencers fitted to motorcycles may not be marked “not for road use” and the Gardaí may be able to measure the noise emitted from vehicles in order to ensure that prescribed noise levels are not exceeded. However, it should be noted that there are also similar concerns, as mentioned in the previous paragraph, regarding checking of certain components due to their location on the vehicle and the possible effects of corrosion and ageing.

#### **4.4.5 Insurance implications**

It is also worth noting that having illegal or incompatible components fitted to a vehicle may render motor vehicle insurance wholly (or partly) invalid. Vehicle owners and operators have a responsibility to ensure their vehicles are maintained in a roadworthy condition and are not modified in such way that would contravene Road Traffic legislation. Insurance companies can provide guidance with regard to limitations to the performance, fitment and use of the vehicle (and its parts) which may affect the insurance policy. The introduction of new regulations on foot of these proposals could affect these limitations.

### **4.5 Market surveillance of motor vehicle components**

Ireland’s membership of the EU requires that national market surveillance authorities are appointed in order to ensure that all products placed on the market meet with Community legislation and are responsible for investigating and preventing abusive or illegal trading practices.

Market surveillance authorities are also required to prevent or restrict the marketing or use of products posing a serious risk to the health and safety of consumers and to notify the European Commission and other member states via the EU Rapid Alert System - RAPEX, when unsafe products are found on the market. Both measures ordered by national authorities and measures taken voluntarily by producers and distributors are reported via RAPEX.

There is currently an EU proposal which is evolving through various stages of the legislative process as part of which, Member States may be required to formally appoint a market surveillance authority for motorcycles, mopeds, trikes and quads (and their components and separate technical units)<sup>6</sup>. The European Commission also intends to introduce market surveillance measures for motor vehicles (4+ wheels) and their trailers<sup>7</sup> as part of an EU

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<sup>6</sup> [COM\(2010\) 542 final](#)

<sup>7</sup> [Work programme on automotive legislation 2011 – 2012 proposals under the responsibility of DG Enterprise & Industry](#)

proposal which would require adoption through the European Parliament and Council.

Should these proposals be adopted, the market surveillance authority appointed shall ensure that vehicles, systems, components and separate technical units made available on the market comply with EU legislation and do not endanger the health or safety of members of the public. Ireland has yet to formally appoint a market surveillance authority for motor vehicles and components but their appointment is under consideration.

Should a market surveillance authority be appointed, they are likely to be empowered to:

- Enter the premises of vehicle/component manufacturers and those involved in the supply chain to carry out random sampling of products in order to ensure that products meet with Community legislation by means of documentary checks and, where appropriate, physical and laboratory checks;
- Ensure that products presenting a serious risk are recalled, withdrawn or are prohibited from being placed on the market;
- Follow up complaints or reports on issues relating to products which infringe on Community legislation or present a serious risk;
- Verify that corrective action has been carried out by manufacturers and those involved in the supply chain;
- Enforce penalties which are effective, proportionate and dissuasive;
- Exchange information with market surveillance authorities in other Member States and also with the European Commission;

The market surveillance authority appointed in Ireland for motor vehicles and two or three wheeled motor vehicles (and their components and separate technical units) may also be empowered to carry out market surveillance functions in relation to component legislation made on foot of this public consultation.

## **5. Summary**

The RSA wishes to put forward the proposal that all replacement brake linings, exhaust silencers and couplings placed on the market will have to be OE components or approved to either ECE or EC standards and be labelled accordingly which will include an 'E' or 'e' mark.

It is proposed that new regulations will make it illegal to supply, sell or fit brake linings, exhaust silencers or coupling devices which are not OE or approved replacements. The new regulations will apply to every vehicle in the Irish fleet regardless of where a vehicle was originally built or approved. There may be exemptions for certain vehicles but components for such vehicles will have to meet alternative packaging, labelling and identification requirements.

## **6. Your comments**

Before recommendations to the Minister for Transport are finalised, we are seeking your comments and views on the proposals being put forward.

We have indicated in this proposal that exemptions may be considered, as we understand that difficulties may be encountered when sourcing approved or OE components for older vehicles or vehicles that have originated outside of Europe. Hence we are especially interested in hearing from both vehicle owners and those involved in the supply or manufacture of the three components discussed above, in order to establish if there are issues with this proposal.

We therefore ask that you provide specific details on your concerns including more detail on specific vehicles that may be affected. Your feedback will be important in ensuring that the policy developed in this area is workable and effective.

The Road Safety Authority is offering you the opportunity to submit comments on the proposal by the 2<sup>nd</sup> of March 2012 via email to [componentsconsultation@rsa.ie](mailto:componentsconsultation@rsa.ie) or in writing to:

Vehicle Standards Section  
Road Safety Authority  
Moy Valley Business Park  
Primrose Hill  
Ballina  
Co Mayo

## **Appendix I**

### **Overview of current legislation governing components in Ireland**

Irish component legislation refers to the EC regulatory acts of type approval regulating individual components, systems and separate technical units for motor vehicles. These regulatory acts mandate that various motor vehicle components are approved in order to be fitted to new vehicles entering the European fleet. The type approval system ensures that new vehicles presented for registration are required to meet with the latest safety and environmental standards and these standards are harmonised throughout the EU, thus removing barriers to trade. Generally, the regulations require that where a component was required to be approved in order to be fitted to a new vehicle, then its replacement component also requires approval. However, vehicles that did not originally require EC approval, for example older vehicles or second hand imports from outside the EU, are not covered by the component legislation.

The following regulations set the specific requirements with regard to the sale, supply and fitment of components<sup>8</sup> and separate technical units<sup>9</sup> for motor vehicles in Ireland:

- S.I. No. 375 of 2007 - Road Traffic (Components and Separate Technical Units) Regulations 2007. These regulations require that a relevant component or separate technical unit purchased or fitted to a motor vehicle or trailer must be approved, marked and fitted to the requirements of the separate Directives of type approval;
- S.I. No. 157 of 2009 - the European Communities (Road Vehicles: Entry into Service) Regulations 2009. These regulations give effect to Directive 2007/46/EC and to each of the separate directives and EC regulations that individually regulate many components, systems and separate technical units of relevant vehicles and their sale and entry into service;
- S.I. No. 629 of 2007 - Road Traffic (Components and Separate Technical Units) (Two and Three Wheel Motor Vehicle) Regulations 2007. These regulations require that a relevant component or separate technical unit placed on the market, sold or intended to be fitted to a two or three wheel motor vehicle must be approved, marked and fitted to the requirements of the separate Directives of type approval.

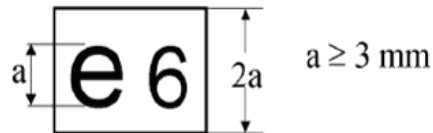
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<sup>8</sup> 'component' means a device subject to the requirements of a Regulatory Act and intended to be part of a vehicle which may be type-approved independently of a vehicle where the Regulatory Act makes express provisions for so doing (from 2007/46/EC)

<sup>9</sup> 'separate technical unit' means a device subject to the requirements of a Regulatory Act and intended to be part of a vehicle which may be type-approved separately but only in relation to one or more specified types of vehicle where the Regulatory Act makes express provisions for so doing (from 2007/46/EC)

**Appendix II**  
**Examples of EC and ECE Approval Markings**

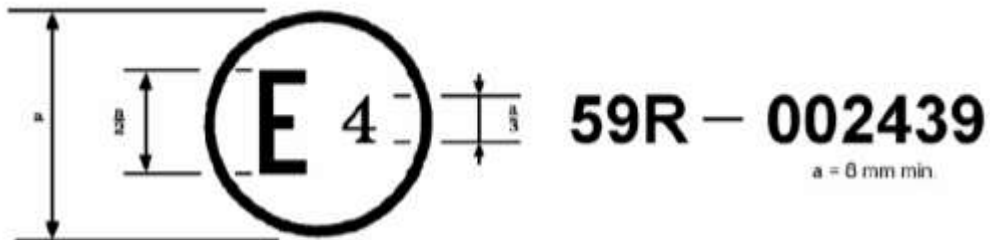
**Example of EC Component Type-Approval Mark**



**Legend:** the above component type-approval was issued by Belgium under Number 0004. 01 is a sequential number denoting the level of technical requirements to which this component fulfils. The sequential number is attributed in accordance with the relevant separate Directive or Regulation.

*NB:* The additional symbols are not shown on this example.

**Example of ECE Component Type Approval Mark**



The above approval mark affixed to a component of silencing system shows that the replacement silencing system type concerned has been approved in the Netherlands (E 4) pursuant to Regulation No 59 under approval number 002439. The first two digits of the approval number indicate that the approval was granted in accordance with the requirements of Regulation No. 59 in its original form.

## **Appendix III**

### **Overview of the EC Regulatory Acts which regulate the standard of the various vehicle components**

#### **Brake linings**

UNECE Regulation 90.01 and EC Directive 71/320/EEC (as amended by 2002/78/EC) regulate the quality and performance of replacement brake linings which can be placed on the market for motor vehicles. These standards require that replacement brake pads and lined shoes must show performance characteristics within +/- 15% of the OE parts and that they are clearly labelled and packaged as being type-approved replacement brake linings. The linings must also meet with the performance requirements of the braking Directive (type O and I tests including additional cold performance testing) and mechanical characteristics (including shear strength and compressibility requirements).

#### **Exhaust silencers**

UN/ECE Regulation 59, EC Directive 70/157/EEC and EC Directive 97/24/EEC regulate the quality and performance of exhaust silencers which can be placed on the market for motor vehicles and motorcycles. These standards require that replacement silencers fitted to a vehicle must achieve the same noise levels (within a specified tolerance) as the OE silencing system fitted and that the performance of the vehicle is not affected. Exhaust silencers which are approved as replacements must bear the manufacturers details and must be 'e' or 'E' marked.

Exemptions may be required for certain vehicles as it could be difficult to source approved exhausts for motor vehicles which were registered before 1970, motorcycles registered before 1985 and vehicles which are not for road use (racing vehicles). However, exhaust components placed on the market for exempt vehicles shall be labelled and packaged accordingly and only be fitted to appropriate vehicles.

For exempt vehicles, replacement exhausts placed on the market will not require approval as long as they are indelibly marked with prescribed text (and also clearly packaged with this wording). Examples of the wording which may be prescribed are as follows:

- (a) "NOT FOR ROAD USE" (in the case of racing vehicles);
- (b) "PRE 1985 MC ONLY" (in the case of motorcycle exhausts);
- (c) "PRE 1970 MV ONLY" (in the case of motor vehicle exhausts).

#### **Coupling devices**

- EC Directive 94/20/EC and UN/ECE Regulation 55.01 set the dimensional, testing, approval and marking requirements for coupling devices for motor vehicles including the following;
- 50mm diameter coupling balls (with flange or towing brackets);
- Coupling heads fitted to the drawbar of trailers for connecting to the 50mm diameter coupling ball on the towing vehicle;
- 50mm pin diameter drawbar couplings;
- 50mm pin diameter drawbar eyes;
- Hook type couplings intended for use with drawbar eyes;
- Drawbar eyes;
- 5<sup>th</sup> wheel couplings.

EC Directive 97/24/EC sets the dimensional and testing requirements for coupling devices for two or three wheelers (including quads) and approved coupling devices are marked in accordance with the requirements of Directive 94/20/EC.

EC Directive 97/24/EC and UN/ECE Regulation 55.01 require that each mechanical coupling device which is approved is affixed with an indelible and clearly legible approval number even when the coupling device is attached to the vehicle. Supplementary markings are required in order to identify the class of coupling device and the permissible values for D, S, V and U where applicable (as defined in Annex I of 97/24/EC).

# Working To Save Lives

## Údarás Um Shábháilteacht Ar Bhóithre Road Safety Authority

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