

# Status of the SubWG1 on Brake Testing

(November 2019)

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# 4th meeting of the SubWG Brake Testing

Venue: Instytut Transportu Samochodowego (ITS),  
Warsaw, Poland

Date: 12.6.2019

- *16 participants representing 13 CITA members*
- *„Double“ meeting, joint with SubWG on Headlight Testing*

# Load measuring device as obligatory PTI equipment according to the Directive 2014/45/EU

During the SubWG meeting the state of affairs was following:

*„Q4 – COM confirmed that a wheel/axle load measuring device is optional. COM also added that this point of Annex III is especially unfortunate from a legal point of view as the Annex sets out mandatory minimum requirements thus this optional measure does not fit into this structure.“*

In: Minutes proposal from the EU DG MOVE Committee on Roadworthiness meeting on 20.9.2018

# After SubWG meeting: next Committee on Roadworthiness meeting, Brussels, 24.6.2019

- From the Slovak point of view, the current Directive's Annex III wording prevents letting out the weighting device from the scope of obligatory equipment
- The Slovak national authority supervising the transposition process would not agree with letting out the weighting device from the national legislation and this status can't be changed by the minutes from Committee on Roadworthiness meeting only

# After SubWG meeting: next Committee on Roadworthiness meeting, Brussels, 24.6.2019

- Slovakia opened the weighting device discussion in the Committee on Roadworthiness meeting again
- Slovakia asked the Commission for the written statement repeating the text from the minutes of the meeting on 20.9.2018 and for the opinion of the Commission Legal Service

# After SubWG meeting:

## possible alternatives according to Slovak MoT

- The wheel/axle measurement device is mandatory for the categories M2, M3, N2, N3, O3, O4 and Tb. If so, it will be necessary to clear this situation and put it also correct into the minutes on the next Committee on Roadworthiness
- To prepare a change of the Directive 2014/45/EU and adopt it in a regular legislative process. Unfortunately the COM declared that it does not plan a change of the Directive sooner than the year 2023.
- The COM would issue an interpretation that the wheel/axle measurement device is mandatory for the categories M2, M3, N2, N3, O3, O4 and Tb in case the Annex I in some of the inspecting items requires the use of this device. This would mean that this equipment would not be necessary in testing centres insofar as the Annex I does not change. This interpretation could be applicable on the basis of the first sentence of Annex III.:  
*„Roadworthiness tests undertaken in accordance with the recommended methods specified in Annex I shall be carried out by using appropriate facilities and equipment.“*

PREFERRED

# CITA Recommendation No. 8 Brake Testing in Vehicle Inspection

- *SubWG received comments and proposals to the Recommendation and is working with it*
- *SubWG proposes to create a questionnaire on demands for testing of brake related ECSS (needs to be approved by the main WG1)*

# Other agenda items

- *Electric brakes on trailers (Belgian and Slovak experience)*
- *Reference braking forces for Volvo Trucks accessible on the internet*
- *Miscellaneous problems from PTI daily practice*
- *For the next meeting: brake test of vehicle combinations*





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