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**Economic Commission for Europe**

Inland Transport Committee

**World Forum for Harmonization of Vehicle Regulations****Working Party on General Safety Provisions****127th session**

Geneva, 15–19 April 2024

Item 12 of the provisional agenda

**UN Regulation No. 118 (Fire resistance of interior materials)****Proposal for the Supplement 2 to the 04 Series of  
Amendments to UN Regulation No. 118 (Fire resistance of  
interior materials)****Submitted by the expert from the European Association of Automotive  
Suppliers \***

The text reproduced below was prepared by the expert from the European Association of Automotive Suppliers (CLEPA). An update to UN Regulation No. 118 proposes the addition of various options that fulfil the marking requirements in cases where more than one UN Regulation applies (e.g. avoid duplicating the E-Marking) as is the current case of UN Regulation No. 107. A reduced-size E-Marking is also proposed as in the current cases of UN Regulations No. 67 and No. 158. The proposal is particularly relevant for small-size components. The modifications to the current text of the UN Regulation are marked in bold for new or strikethrough for deleted characters.

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\* In accordance with the programme of work of the Inland Transport Committee for 2024 as outlined in proposed programme budget for 2024 (A/78/6 (Sect. 20), table 20.5), the World Forum will develop, harmonize and update UN Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.



## I. Proposal

Insert new paragraph 4.4.3.1., to read:

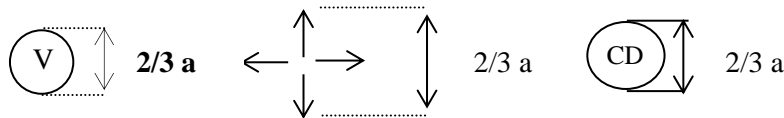
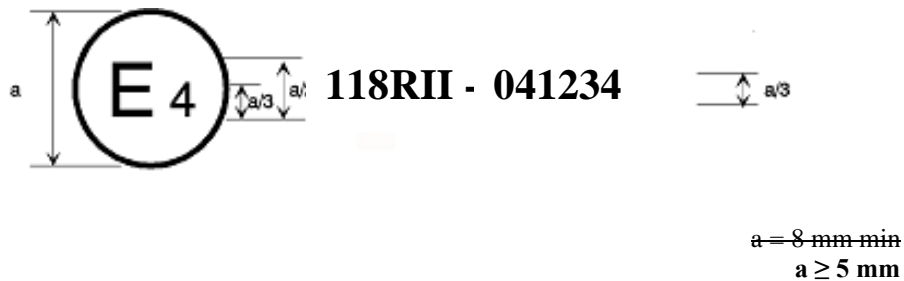
**"4.4.3.1. If the component conforms to a component type approved, under one or more other Regulations annexed to the Agreement, in the country which has granted approval under this Regulation, the symbol prescribed in paragraph 4.4.1. above need not be repeated; in such a case, the Regulation and approval numbers and the additional symbols of all the Regulations under which approval has been granted in the country which has granted approval under this Regulation shall be placed in rows to the right of the symbol prescribed in paragraph 4.4.1. above."**

Annex 5,


Example 2, amend to read:


**"Example 2**


(See part II of this Regulation)



The above approval mark affixed to a component shows that the type concerned was approved in the Netherlands (E4) pursuant to Part II of UN Regulation No. 118 under approval number 041234. The first two digits (04) of the approval number indicate that the approval was granted in accordance with the requirements of the 04 series of amendments to UN Regulation No. 118.

The additional symbol  indicates the direction which the component may be installed.

The symbol  indicates that the component fulfils the requirements in paragraph 6.2.2.

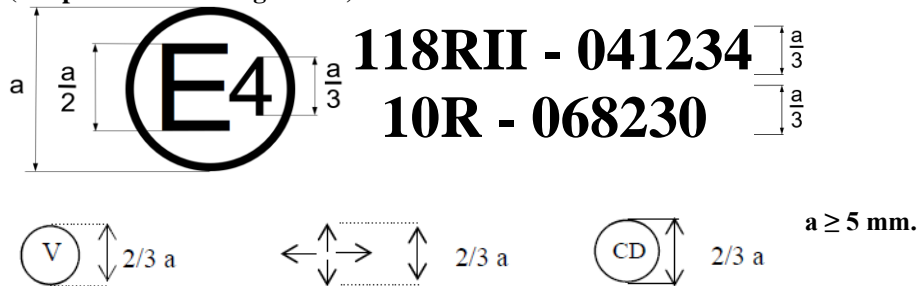
The symbol  indicates an approval as a complete device such as seats, separation walls, etc.

The additional symbols are only used if applicable.

Insert new Example 3, to read:


**"Example 3**


(See part II of this Regulation)



The above approval mark affixed to a component shows that the type concerned was approved in the Netherlands (E4) pursuant to Part II of Regulation No. 118 under approval number 041234 and Regulation No. 10<sup>1</sup> under approval number 068230.

The first two digits of the approval number indicate that, at the date when the respective approvals were given, Regulation No. 118 included the 04 series of amendments and Regulation No. 10 included the 06 series of amendments.

The additional symbol  indicates the direction which the component may be installed.

The symbol  indicates that the component fulfils the requirements in paragraph 6.2.2.

The  symbol indicates an approval as a complete device such as seats, separation walls, etc.

The additional symbols are only used if applicable."


## II. Justification

1. Vehicle components are often in the scope of more than one UN Regulation. Placing two or more distinct UN approval marks on one component is complex and burdensome, especially for small size components.

2. UN Regulation No. 107 specifically allows different options to fulfil the marking requirements in cases where more than one Regulation applies (e.g. avoiding a duplication of the E-Marking saves space and simplifies the requirement). UN Regulations No. 67 and No. 158 allow a minimum E-Marking size of 5 mm.

3. The flexibility provided by these UN Regulations is particularly relevant and necessary in the case of small components with a limited available surface area for printing regulatory marking (e.g. valves, sensors). However, such flexibility is not included in UN Regulation No. 118. The proposal aims to achieve regulatory harmonization in terms of the options available to fulfil marking requirements by extending the options provided by UN Regulations Nos. 67, 107, 158 to UN Regulation No. 118 and particularly:

(a) in the case when more than one UN Regulation applies to one component, then the E-Marking may be not duplicated (i.e. allow the so-called "Twin Marking");

(b) dimension of the E-Marking is reduced to address the needs of small  size components.

<sup>1</sup> The second number is given merely as an example.

4. The proposal also clarifies the (missing) dimensions of the symbol as in the case of the current Example 2 by adding **2/3a** to its right.

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