Discussion on GRVA-20-30 proposal and UN ECE Regulation No. 90

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Material Manufacturers

Background

- At the last GRVA meeting (session 20), a UK proposal (GRVA-20-30) was presented.
- Proposal aimed to amend UN R90 Regulation to include 'bedding-in' procedure in type approval certificates.

Concerns on Proposal GRVA-20-30

- Over 25 years of successful R90 type approvals without issues.
- Bedding-in procedure is flexible and effective.
- Additional costs for manufacturers
- Reduced competitiveness for technical services.
- Current bedding-in ensures stable coefficient of friction and brake stability.

Alternative Solution: Manufacturer-Specified Bedding-In

Proposal to specify bedding-in procedures in fitting instructions faces criticism:

- Challenges in managing fitting instructions for different materials.
- Potential insurance issues if end-users fail to comply.
- Confusing for customers, who are not professional test drivers.
- Execution of procedure on public road?

Market Surveillance (MS) Testing Concerns

- Bedding-in in MS testing often differs from type approval test conditions.
- MS testing usually uses new pads on used discs, unlike type approval tests.
- Results depend on consistent conditions, which are not always met.
- Need for identical conditions in type approval and MS tests.

Observations on UK Proposal

- UK has historically used 'grandfathering' to generalize results across components.
- Bedding-in impacts test results but is not the most critical factor.
- Physical tests (one per certificate) ensure better consistency of results.
- Bedding-in requirements in documents may not apply to all conditions.

Conclusion

- Current R90 bedding-in process is effective and flexible.
- Proposed changes could increase costs and create confusion.
- Focus should remain on ensuring consistent testing conditions and practices.
- Should changes to the R90 bedding-in procedure be required, these should be formulated by experts in a sub-working group.