<u>Informal document</u> **WP.29-197-26** 197th WP.29, 11-14 November 2025 Agenda item 8.1

Non-conformities detected on E9 approved trucks



Subdirección Gral. De Calidad y Seguridad Industrial
Dirección Gral. De Estrategia Industrial y PYME
Secretaría de Estado de Industria

1. Context

• wp.29 march '25

 Russian Federation informs on state control (supervision) program and lack of response from granting TAA, after non-conformities had been encountered regarding UNR 51, 58, 73 and 121. (wp.29-195-11)

wp.29 june '25

- Detailed presentation from Russian Federation representative (wp.29-196-08)
- Compromise from ES representative to cooperate and start investigation to restore conformity

2. Actions taken by E9

- Contact details
 - Verification that information on UNECE website is up to date

Select a country to display its list of Type Approval Authorities and Technical Services.



- Gather information from Russian authorities: test reports, details of the vehicles (age, mileage, WVTA, ...)
- Meeting with Technical Service Testing/Type-Approval (IDIADA) + Conformity of production (UCA)
 - Analysis of TA documentation
 - Analysys CoP documentation-> No production in Y24 for 51R and 73R approvals
 - Decision to perform ad-hoc on-site CoP audit



2. Actions taken by E9

- Ad-Hoc Physical Audit in OEM HQ on october 16th
 - Noise level: Among other aspects, checks and traceability of components were carried out using the BOM of the vehicle indicated in the complaint and those reflected in the homologation. Nothing was detected that was not included in the homologation.
 - Rear protection: Among other aspects, checks and review of technical drawings were carried out, as well as verification of material quality and BOM. On-site supervision of testing at UTI was conducted at 2 out of 3 points.

2. Actions taken by E9

- Ad-Hoc Physical Audit in OEM HQ on october 16th
 - Side protection: Among other aspects, checks were carried out to confirm that the design of the side protection had been updated to address non-compliance issues related to sharp edges. Regarding installation, it was verified that the side protection includes an air filter assembly installed on the vehicle that complies with the specifications of point 13.2 of UN Regulation No. 73, as it is installed 110 mm inward from the outermost surface of the vehicle, with the maximum permitted distance being 150 mm, as established in point 12.1 of the Regulation. This detail is mentioned because it appears not to have been considered in the complaint report.

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