

## AES/BES Webinar (4<sup>th</sup> July 2024) Questions & Answers

### Application Cases

- **Do we need to initiate an application from the portal whenever there is a change to the approved AES/BES document?**
  - *Yes, but there is a simplified application type to cover minor changes such as administrative corrections or non-emissions critical updates, as well as the full technical review application type.*
- **Can you please confirm that for GB Small Series Scheme the AES/BES assessment is not needed?**
  - *Correct, there is no AES/BES assessment as part of emissions requirements for GB small series type approval.  
If applying for GB medium series type approval, AES/BES assessment is required but we can apply flexibility in the test data provided noting the different testing requirements applicable to vehicles approved under this scheme.*
- **For heavy duty types, is Preliminary Information Report information required when the emission approval is to UNECE Regulations and not to EU directives. That is to say that the emissions information given in the whole vehicle type approval documentation is to UNECE regs and not EU directives.**
  - *No, if applying for an E11 UNECE approval then a more in-depth review will take place alongside Technical Service activity, so the Preliminary Information Report is not required as part of the application. If utilising a UNECE type approval from another Approval Authority as part of your GB whole vehicle application, then no AES/BES assessment is required as it has been covered by another Approval Authority and the approval is subject to mutual recognition provisions.*
- **Do these requirements impact SPV vehicles? (WAVs specifically)**
  - *In general, we would expect vehicles of this sort to rely on the base vehicle for emissions approvals, but requirements should be assessed on a case-by-case basis noting the particular SPV requirements from the GB type approval framework.*
- **If, at some point another Technical Service is designated for GB Type Approval, will this process still need to be completed by VCA?**
  - *This has not been confirmed yet and will be determined as part of our GB Technical Service designation process once we have established the relevant competence and procedures of Technical Services in this subject area.*
- **Can this process be used to apply for assessment of emission strategy documentation for non-road mobile machinery (NRMM) engine applications?**
  - *No, currently the process is only applicable for light and heavy-duty on-road applications. We will consider expanding the process to cover NRMM applications in future developments but in the meantime strategy documentation should be assessed as part of a general type approval application in these cases rather than using this standalone process.*

### Application Process (General)

- **For AES/BES assessment for EU Type Approvals where VCA is only TS and not TAA, should the invoicing account be chosen for VCA UK invoicing account or VCA Europe invoicing account?**

- *VCA Europe invoicing accounts should be used for EU type approval applications (including AES/BES applications). The application form and process are the same regardless of whether applying through the VCA or VCA Europe Portals.*
- **We have a very long list of types covered by a given AES/BES document, how should we manage this when asked to enter the types in the application form?**
  - *This field of the application form is a free text field with a large character limit, so it is possible to enter large amounts of data by copying and pasting. If it is not possible to consolidate your list of types into the field in an easily readable manner, please use the field to reference the relevant page of your extended documentation package where this information is provided.*
- **We wish to use the same document to cover both an EU and GB application but apply for these approvals via separate customer accounts. How do we do this if the AES/BES validation number is attached to the customer account?**
  - *In these cases, a separate record will have to be created under each account. However, when creating the second duplicate record you can use the 'has this extended documentation package been reviewed and approved as part of another application' option on the application form which will limit the need for further data entry or technical assessment on the duplicate application, while still generating a new validation number under the second customer account for you to use.*
- **Where AES/BES documentation is requested as part of the 'supporting files' part of the application form, does this refer to the extended documentation package (EDP), formal documentation package (FDP), or both?**
  - *Both extended and formal documentation packages should be applied where applicable, noting that some legislation does not require a formal documentation package.*
- **Why has the new 'task' to link type approval applications to AES/BES documents been implemented when this was not required previously?**
  - *While we acknowledge that this task does add a new step to approval applications for manufacturers, the objective is to simplify and speed up the process of issuing emissions type approvals for all customers. The reliance on technical specialists to identify which AES/BES document was associated with a given type approval risked causing a significant bottleneck in processing of applications as volumes increased. The new process will enable manufacturers to make this link at time of application as they have the information immediately available, with VCA's Certification team doing a quick validation check instead of referring to Technical Specialists for document review.*
- **When given a 'task' in the VCA Portal to link an emissions type approval application to an AES/BES document, how should this be handled in cases where there is no applicable AES/BES document, e.g., for pure electric vehicles, or installation approvals for heavy duty vehicles?**
  - *In these cases, please email [type.approval@vca.gov.uk](mailto:type.approval@vca.gov.uk) referencing the concerned customer order(s)/work order(s) and a brief note as to why AES/BES is not applicable, e.g., "AES/BES not applicable for this application as a pure electric vehicle". VCA's certification team will then bypass the task and continue with the approval issuing process. Please note the task may remain on your portal account, but no further action will be required once the type approval is issued. We recognise that task generation in these cases is a deficiency of the current system, but it was unfortunately unavoidable in the first system release due to task*

*generation being linked to legislation rather than vehicle specific details. We are working on an alternative solution for future development to remove the need for manufacturers to email VCA in these cases.*

#### Historic & In-Progress Applications

- **We need a validation number for update to existing AES BES, but if there is no initial validation number because the original type approval was handled in the old VCA Portal process or Sharefile, how do we get the validation number?**
  - *VCA will migrate existing clearances that have been worked on over the past two years into the new system. Once this migration is complete, validation numbers for these historic applications will be visible via your customer account.*  
*If needed to update or reference an application that was not captured in the data migration, a new record can be quickly generated by making an application for a new assessment and selecting the 'has application already been reviewed by VCA as part of another application' option.*
- **If manufacturer has already submitted type approval application using old system (not the portal) few months back and submitted the documentation on email, is AES BES assessment on portal still required? The approval is in final stage review.**
  - *In-progress applications will be completed without the need for further manufacturer input. Once in-progress applications are completed, new records will be created for these applications to generate the necessary validation numbers.*

#### Preliminary Information Report for GB Applications

- **Does the upfront summary for GB applications mentioned in the presentation refer to cover pages?**
  - *No, this refers to the 'Preliminary Information Report' completed as part of the application process. Cover pages are a different item relating to type approval applications.*
- **Are the temperature and weight tests a requirement from the regulation or is this a VCA requirement? If it's a VCA requirement and our vehicles have not been tested to these requirements, do we need to arrange further testing?**
  - *The data request derives from legislation and the requirement to assess the increase in emissions when an AES is active. The test boundary conditions are within the regulatory requirements for RDE and PEMS testing, and the expectation is these conditions have been verified by the manufacturer as part of a standard Design Verification Process during the development phase, which feeds into the RDE declaration. However, we take a pragmatic approach and if test data which falls exactly within these conditions does not exist, we would welcome an open discussion on what data may be held which would help us make an AES impact assessment. We would aim to avoid the need for further testing wherever possible in these cases.*
- **Can impact data only be measured on a vehicle or can the manufacturer perform on a test bench?**

- *The preference is for test data from vehicle-based testing as this provides representative real-world performance, however test bench data can be accepted in some circumstances where vehicle-based test data is not available.*
- **For impact data, we could see RDE test data case 1&2 as an example. Is it a mandatory field? And if yes, normal RDE test during homologation process could cover it? Or any kind of additional RDE test under harsh condition is requested?**
  - *Yes, the test data fields are mandatory but they are free text fields so it is possible to enter “-“ or “Not applicable” if data is missing for some elements. In these cases, explanation should be provided using the ‘notes’ field of the application form. It may be possible for homologation RDE tests to serve the purpose of the impact data, but it depends if the test was conducted in conditions that are likely to trigger an AES response, and therefore provides useful information to determine the emissions impact of particular strategies. Test data does not need to be from witnessed certification testing, internal development testing is sufficient to cover these requirements.*
- **Can the data necessary for the Preliminary Information Report be uploaded via an excel import?**
  - *No, currently the data can only be entered via the digital form on the VCA Portal. We will take this suggestion into consideration for future development.*
- **Is there a level of EU or UNECE compliance that will not require this additional RDE data?**
  - *If applying for GB type approval based on EU type approval, then the additional data is required to enable VCA to make a more streamlined assessment of documentation. If using a UNECE type approval from another Approval Authority as part of your GB whole vehicle application, then no AES/BES assessment is required.*