

WHAT IS THE STATUS OF NON-COMPLIANCE OF AFTERMARKET NON-ORIGINAL BRAKE PADS

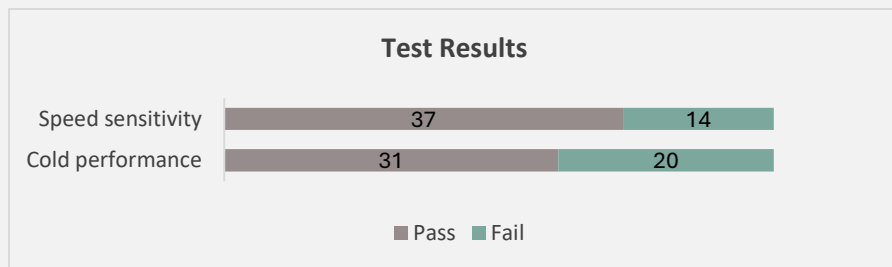
ABOUT THE PROJECT

[JAHARP2021-03](#) is a pan-European project, co-financed by the EU, which started in April 2022 and is now reaching its completion. This project focused on brake pads, targeting for the first-time aftermarket non-original brake pads for category M1 (≤ 3.5 tonnes) vehicles. It fell within the scope of the General Safety Regulation (modified by Commission Regulation (EU) 2015/166), where it is established that replacement equipment already placed on the market, such as non-original brake components, shall fulfil either the provisions of Directive 71/320/EEC or UNECE Regulation No 90.

KEY FINDINGS

After a thorough market and risk analysis, the project group identified 51 aftermarket non-original brake pad sets for category M1 vehicles for document checks and for vehicle-based testing in a technical service facility.

The testing and documentary checks have revealed a high non-compliance rate. In total, **28 of the 51 sets (55%)** failed the test programme. The main areas of non-compliance observed in product testing concerned the **cold performance equivalence** test and the **speed sensitivity test**. The figure below shows the number of brake pad sets that failed those testing criteria.



Ensuring brake pads meet the regulatory requirements is crucial for maintaining vehicle safety, reliability, and performance in all driving conditions. Low quality non-compliant brake pads may reduce braking efficiency, making it harder to stop the vehicle and increasing the risk of accidents. For example, at higher speeds, more heat is generated during braking. This can affect the performance of the brake pads, potentially leading to brake fade if the system is not designed to handle the increased thermal load.

The MSAs have determined that non-compliance for cold performance (i.e., the performance of the braking system at low temperature, which represents the initial period of driving) generally poses a low risk, apart from vehicles without an ABS braking system. Non-compliance for speed sensitivity poses a serious risk in some circumstances, particularly under emergency braking in cases of dynamic driving conditions.

Caution!

The above results are based on products that were sampled from the markets in the participating countries by experienced market surveillance inspectors that were looking for non-compliant products. As in any routine market surveillance activity, the results represent the targeted efforts that authorities undertake to identify non-compliant products. They do not give a statistically valid picture of the market situation.

Market Surveillance Cycle



PARTICIPATING AUTHORITIES

4 Market Surveillance Authorities from the following 4 Countries have participated in this Joint Action coordinated by [PROSAFE](#): Latvia, Luxembourg, the Netherlands, and Romania.

Disclaimer

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MAIN CHALLENGES

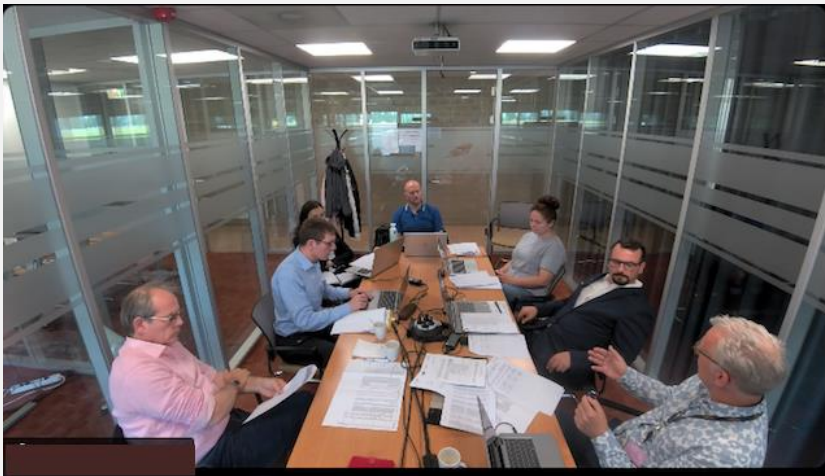
The main issues in this sector for MSAs are **obtaining the necessary information** from the manufacturer and other identification codes for traceability purposes. **Being granted access to type approval documentation with the necessary status of a ‘contracting party’** was also a challenge for some authorities.

In addition, a review of UNECE Regulation No 90, which formed the basis of the product testing, suggested **the need for a documented bedding-in procedure for brake pad sets**. The testing process would also benefit from the original equipment manufacturers (OEM) retaining the original brake pad sets for comparative purposes.

In addition, the need for harmonisation of market surveillance methodologies is a cross-cutting issue that this Joint Action and several other EU-funded initiatives try to mitigate through the encouragement of discussions and sustained collaboration among national authorities.

PROJECT VISIT TO THE TEST CENTRE

The project group visited the test centre on 07 June 2024, where all 51 of the selected products were being tested. The project team met with testing experts to review and discuss the test results, as well as potential hazards in order to support the project's risk assessment task.



Discussions extended to recommendations and suggestions for improving UNECE Regulation No 90 particularly around the bedding-in of brake pad sets, and the possibility of MSAs attaining the status of a ‘contracting party’ for the purposes of obtaining type approval documentation.

These are matters that would need further consideration and debate within the relevant Working Group and indeed among type approval authorities.

FINAL CONFERENCE

The final conference of the project took place online on **19 July 2024**. The key results were shared and discussed with the European Commission and stakeholders. A layman's report presenting these findings will be prepared and published on the [PROSAFE's website](#).

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