

Manufacturer Statement on the Legal Classification of the Rear License Plate Lowering Kit within the European Union

(For vehicles up to 3.5 t GVW – Van and Light Vehicle Category)

1. Purpose of this Statement

This document provides a technical and legal clarification concerning the conformity of the Rear License Plate Lowering Kit produced by PUSH components with applicable European Union and United Nations Economic Commission for Europe (UNECE) regulations. It explains why the product does not require an individual type approval, EC type approval, or a national technical inspection in EU Member States.

2. Technical Description

The Lowering Kit allows the rear registration plate of a light vehicle to be relocated approximately 200 mm lower than its original position. The modification prevents obstruction of the plate by load carriers or transported goods while maintaining compliance with all relevant visibility, illumination, and installation requirements.

The Kit:

- uses existing mounting points on the vehicle;
- does not alter any structural, safety-related, or lighting components;
- retains the original license plate lighting unit in its approved condition;
- ensures the minimum ground clearance and required viewing angles according to ECE Regulation No. 48 remain respected.

3. Compliance with EU and UNECE Legislation

ECE Regulation No. 48 – Installation of Lighting and Light-Signalling Devices:

The relocated registration plate remains within the permitted installation zones defined in Annex 3, paragraph 9. All visibility angles and minimum height above the ground remain compliant with the regulation.

ECE Regulation No. 4 – Illumination of Rear Registration Plates:

Since the vehicle's original lighting device continues to illuminate the plate fully and uniformly, the requirements for plate illumination are maintained. No separate lighting device is added or modified.

Regulation (EU) 2018/858 – Framework for the Approval and Market Surveillance of Motor Vehicles:

According to Article 3(31) and Annex II, the Lowering Kit does not constitute a system, component, or separate technical unit subject to EU type approval. It merely provides an alternative mechanical mounting position for an already approved component (the license plate and its lighting). Therefore, it does not affect the EU type-approval status of the base vehicle.

4. Legal Assessment

Because the Kit:

- introduces no new lighting or electrical equipment,
- does not affect emissions, safety systems, or vehicle structure, and
- preserves compliance with all relevant UNECE standards,

it is not subject to additional EU type approval or national technical certification under current legislation. Each installation must nevertheless maintain the geometrical and illumination requirements of ECE R48 and R4; these parameters can vary between vehicle models.

5. Conclusion

The PUSH components Rear License Plate Lowering Kit constitutes a purely mechanical accessory within the scope of existing EU and UNECE regulations. When installed according to the manufacturer's instructions, it preserves full compliance with European road-traffic and vehicle-construction standards. Consequently, no individual approval, national type certificate, or inspection procedure is required for its use within EU Member States.

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