

NEXT-LEVEL TYPE APPROVAL



Next-Level Type Approval in Germany: From Component Test Reports and ABEs to National Component Type Approval

A compact guide for manufacturers and developers
on the new rules for aftermarket and tuning parts

Next-Level Type Approval – Product Safety Meets Process Clarity

Germany's regulatory landscape for aftermarket vehicle components is evolving.

This ALEE Information Sheet provides manufacturers, developers, and importers with a clear overview of new obligations, approval pathways, and opportunities in the German market.

As a Technical Service designated by the German Type Approval Authority **Kraftfahrt-Bundesamt (KBA)**, ALEE supports you from initial inquiry to successful market entry.

Phase-Out of Component Test Reports

Component Test Reports (Teilegutachten) are being gradually phased out.

As of **June 20, 2025**, no new reports or extensions may be issued.

Existing reports issued before this date remain valid but may only be used for installation inspections under **§19(3) StVZO** until **June 19, 2028**.

After that, they may only be used in the context of individual vehicle approvals under **§19(2) in conjunction with §21 StVZO**.

Simplified inspections under §19(3) will no longer be permitted.

Already-installed components remain compliant if the report was valid at the time of installation.

ABE Renamed: National Component Type Approval

As of **June 20, 2024**, the former Allgemeine Betriebserlaubnis (ABE) for vehicle parts under §22 StVZO has been renamed to **National Component Type Approval**.

The approval process remains largely the same. The key change: the approval number now contains **six digits** instead of five (e.g., KBA 123456).

From that date forward, the **KBA only issues National Component Type Approvals**. Existing ABEs remain valid and can still be extended.





Both the former ABEs and the new approvals ensure that components, when installed correctly, do not compromise the compliance of the vehicle.

The approval process follows standard type-approval principles and requires testing by a designated Technical Service.

Additionally, a **manufacturer initial assessment** by the KBA is required as part of the process.

Need Support with the Manufacturer Assessment?

Through close cooperation with a KBA-designated certification body for management systems, ALEE offers full-service support – from audit preparation to complete documentation.

KBA's Green and Red Lists: What Can Be Approved?

To provide clarity, the KBA regularly publishes two reference lists:

✓ **Green List:** Lists components that are generally eligible for approval, with harmonized test criteria and established testing scopes.

✗ **Red List:** Lists components currently **not eligible** for approval – for example, due to missing test standards or legal restrictions.

These lists are regularly updated. Items may be added, removed, or modified as EU or UN harmonization progresses.

Important note: The lists do not include components approved under §22a StVZO (national type approval) or under EU/UN-ECE regulations.

Where international requirements are missing, **national standards** such as technical guidelines or VdTÜV bulletins may be used. The applicable version of the regulation is always the one valid **at the time the product is placed on the market**.

The KBA determines the component "type" on a case-by-case basis.

For Holders of Component Test Reports (Teilegutachten)

If you currently hold a component test report, consider early whether a new National Component Type Approval is necessary and possible.

While a direct conversion is not allowed, previous test results can often be reused – as long as:

- the component remains technically unchanged, and
- the test standards are still applicable.

Recommendation: Start the process early. ALEE supports you in evaluating your situation and preparing the technical reports and documentation needed for approval – efficiently and tailored to your product range.

Why These Changes Were Introduced

The reform aims to increase **road safety** and **quality assurance** in the approval process.

Recent market surveillance by the KBA revealed a rise in **deficient or incorrect test reports**.

With National Component Type Approvals, the KBA now holds **greater authority** – including market surveillance, conformity checks, and the power to revoke approvals in case of violations.



What changes for end users and manufacturers?

For end users: Previously, a component with a test report required a physical inspection by a technical expert under **§19(3) StVZO** before it could be used legally on public roads.

Now, with a National Component Type Approval under **§22 StVZO**, no additional inspection is generally required.

If the part is installed according to the provided instructions, the vehicle can be used directly. The only requirement: the vehicle owner must carry a copy of the approval.

What must manufacturers provide?

Just like before, some documentation must accompany the product.

For National Component Type Approvals, these include:

- a copy of the approval with all relevant technical and installation details
- a clear, German-language installation manual

Important:

Only customer-relevant documentation must be provided.

Confidential data such as drawings or test reports remain with the manufacturer.

Summary: The new regulations simplify the process for users and introduce **clear, enforceable standards** for manufacturers – without compromising technical quality.

Have questions about the new approval system?

We're here to help.

ALEE – Alliance des laboratoires d'essais européenne GmbH

Technical Service for type approval of vehicles and components

Designated by the German Type Approval Authority (KBA)

🌐 www.lab-alliance.eu
✉ info@lab-alliance.eu
☎ +49 6071 496 74 82

Commercial Register: Amtsgericht Darmstadt/HRB 105486

VAT-ID: DE 363845517

KBA

Benannter TD
KBA-P 00125

