

EU WHOLE VEHICLE TYPE-APPROVAL CERTIFICATE

Communication concerning:

- -EU whole-vehicle type-approval⁽¹⁾
- extension of EU whole vehicle type approval (1)
- -refusal of EU whole-vehicle type-approval (1)
- -withdrawal of EU whole-vehicle type-approval (1)

of a complete vehicle type

with regard to Regulation (EU) No 167/2013, as last amended by (Commission Delegated) ⁽¹⁾ Regulation (EU) No 2019/519 ⁽¹⁾⁽⁵⁾

EU type-approval number: e24*167/2013*00281*00 Reason for extension/refusal/withdrawal(1): - N/A SECTION I 1.1. Make (trade name of manufacturer): Palazoğlu, Hexagona 1.2. Type (2): PC 1.2.1. Variant(s) (2): See Part II of Information document 167/2013-PC-00 1.2.2. Version(s) (2): See Part II of Information document 167/2013-PC-00 PCR3A 1.2.3. Commercial name(s) (if available): Category, subcategory and speed index of vehicle (3) 1.3. R3a1.4. Company name and address of manufacturer of the complete vehicle: PALAZOGLU TARIM ALETLERI SANAYI VE TICARET LIMITED SIRKETI YENI KANDIRA YOLU UZERI 11.KM IZMIT(MRK) KOCAELI/TURKEY 1.4.1. Name(s) and address(es) of assembly plants: YENI KANDIRA YOLU UZERI 11.KM IZMIT(MRK) KOCAELI/TURKEY 1.4.2. Name and address of manufacturer's authorised representative, if any: Alexandros Pavlidis 57011 Vathilakos Thessaloniki/Greece



<u>e24*167/2013*00281*00</u>

SECTION II

1. Technical service responsible for carrying out the tests: TÜV Austria Automotive GmbH

Deutschstraße 10, A-1230 Vienna,

Austria

2. Date of test report: *03.11.2020*

3. Number of test report: 20-TAMO-0239

SECTION III

The undersigned hereby certifies the accuracy of the manufacturer's description in the attached information document of the vehicle type described above, for which one or more representative samples, selected by the EU type-approval authority, have been submitted as prototypes of the vehicle type and that the attached test results apply to the vehicle type.

1. The complete vehicle type meets/does not meet (1) all relevant requirements as listed in Annex I to Regulation (EU) No 167/2013.

1.1. Restrictions of validity ⁽¹⁾⁽⁶⁾: N/A

1.2. Waivers applied (1)(7):

1.2.1. Reasons for the waivers $^{(1)(7)}$:

1.2.2. Alternative requirements $^{(1)(7)}$:

2. The approval is granted/extended/refused/withdrawn (1) Granted

2.1. The approval is granted in accordance with Article 35 of Regulation (EU) No 167/2013 and the validity of the approval is thus limited to dd/mm/yy ⁽⁶⁾. *N/A*

Place: Dublin

Date: 01st December, 2020.

Name and signature (or visual representation of an 'advanced electronic signature' according to Directive 1999/93/EC, including data for verification):





<u>e24*167/2013*00281*00</u>

Attachments:

- -Information package
- -Test results
- -Name(s) and specimen(s) of the signature(s) of the person(s) authorised to sign certificates of conformity and a statement of their position in the company
- -A completed specimen of the certificate of conformity

NB:

- If this model is used for type-approval of a vehicle as an exemption for new technology or new concept, pursuant to Article 35 of Regulation (EU) No 167/2013, the heading of the certificate shall read 'EU WHOLE-VEHICLE PROVISIONAL TYPE-APPROVAL CERTIFICATE VALID ONLY ON THE TERRITORY OF ... ⁽⁴⁾'. The provisional type-approval certificate shall also specify the restrictions that have been imposed as to its validity and the waivers which have been applied in accordance with Article 25(4) of Regulation (EU) No 167/2013.
- If this model is used for vehicle type-approval for a national small series, pursuant to Article 37 of Regulation (EU) No 167/2013, it shall not bear the heading 'EU VEHICLE TYPE-APPROVAL CERTIFICATE'. The text shall specify the nature of the waivers, the reasons which support them and the alternative requirements granted pursuant to Article 37 ⁽²⁾ of Regulation (EU) No 167/2013.
- (1) Delete where not applicable.
- (2) Indicate the alphanumeric code Type-Variant-Version or 'TVV' allocated to each type, variant and version as set out in point 2.3 of Part B of Annex I. For the identification of variant and versions it may be employed the matrix set out in point 2.2 of Part B of Annex I to this Regulation.
- (3) Classified according to Article 4 of and Annex I to Regulation (EU) No 167/2013, the coding shall be indicated, e.g. 'T4.3a' for a low-clearance tractor with a maximum design speed below or equal to 40 km/h
- (4) Indicate the Member State.
- ⁽⁵⁾Indicate only the latest amendment in case of an amendment of one or more Articles of Regulation (EU) 167/2013, according to the amendment applied for the EU type-approval.
- ⁽⁶⁾Applicable only for type-approval of a vehicle as an exemption for new technology or new concept, pursuant to Article 35 of Regulation (EU) No 167/2013
- (7) Applicable only for vehicle type-approval for a national small series, pursuant to Article 37 of Regulation (EU) No 167/2013.



EC Type Approval No:

*e24*167/2013*00281*00*

TEST RESULTS

1. Results of the sound level test (external):

Measured according to Annex III to Commission Delegated Regulation (EU) 2018/985, as last amended by Commission Delegated Regulation (EU) .../... $^{(1)}$ $^{(3)}$

Variant/version:						
Moving: dB(A)	dB(A)	dB(A)	dB(A)	dB(A)	dB(A)	dB(A)
Stationary: dB(A)	dB(A)	dB(A)	dB(A)	dB(A)	dB(A)	dB(A)
Engine speed min ⁻¹ :	min ⁻¹					

2. Results of the exhaust emission tests

Measured according to:

— Annex I to Commission Delegated Regulation (E	(U) 2018/985, as last amended by Commission Delegated
Regulation (EU)/ $^{(1)}$ (3):	yes/no ⁽¹⁾ ;

— Annex XII to Directive 2016/1628/EC of the European Parliamen	at and of the Council, as last amended by
(Commission) (1) Directive No 2016/1628/EU (1) (4).	ves/no ⁽¹⁾ .

 Regulation (EC) No 595/2009 of the European Parliament and of the Council, as last amended by (Commission
Delegated) (1) Regulation (EU) (No) (1)/ (1) (5) (of the European Parliament and of the Council) (1):
ves/no ⁽¹⁾ ·

2.1 NRSC/ESC/WHSC ⁽¹⁾ final test results (inclusive of Deterioration Factor):

Variant/Version		
СО	g/kWh	g/kWh
НС	g/kWh	g/kWh
NOx	g/kWh	g/kWh
HC+NOx	g/kWh	g/kWh
PM	g/kWh	g/kWh
PN	g/kWh	g/kWh



EC Type Approval No: <u>e24*167/2013*00281*00</u>

2.2 NRTC/ETC/WHTC ⁽¹⁾ final test results (inclusive of Deterioration Factor and weighted average of hot start and cold start transient cycles) ⁽²⁾:

Variant/Version		
CO	g/kWh	g/kWh
НС	g/kWh	g/kWh
NOx	g/kWh	g/kWh
HC+NOx	g/kWh	g/kWh
PM	g/kWh	g/kWh
PN	g/kWh	g/kWh

2.3 CO2 (9)

Variante/Version		
CO ₂	g/kWh	g/kWh

3. Driver-perceived sound level

Measured according to Annex XIII to Commission Delegated Regulation (EU) No 1322/2014, as last amended by Commission Delegated Regulation (EU) .../... $^{(1)}$ $^{(3)}$

Variant/version:			
Driver's exposure to noise level	dB(A)	dB(A)	dB(A)
Test method used:			
Test method 1 in accordance with section 2 of Annex XIII to Commission Delegated Regulation (EU) No 1322/2014 (1)			
Test method 2 in accordance with: section 3 of Annex XIII to Commission Delegated Regulation (EU) No 1322/2014 (1)			



EC Type Approval No:

<u>e24*167/2013*00281*00</u>

4. Braking performance

Measured according to Annex II to Commission Delegated Regulation (EU) 2015/68, as last amended by Commission Delegated Regulation (EU) 2016/1788 $^{(1)}$ (3)

Table I

*Variants A2T1, A2T2, A3Y1, A3Y2 (Report number: LCTR 1558 001 20)

		Axles of the vehicle			Reference axles		
	Static mass (P) ¹	Braking force needed at wheels	Speed	Test mass Pe = Fe/g	Braking force developed at wheels	Speed	
	kg	N	Km/h	kg	N	Km/h	
Axle 1	8000	50201	40	10629.96	60890	40	
Axle 1	8000	50201	40	10629.96	60890	40	
	8000	50201	40	10629.96	60890	40	

⁽¹⁾ See point 2.1. of Appendix 1 to Annex VII of Regulation (EU) 2015/68.

Table II

*Variants A1N1, A1N2, A1N3

Total mass of the vehicle submitted for approval	Kg
Braking force needed at wheels	N
Retarding torque needed at main shaft of endurance braking system Nm	Nm
Retarding torque obtained at main shaft of endurance braking system (according to diagram)	Nm



EC Type Approval No:

<u>e24*167/2013*00281*00</u>

Table III

Reference axle (PLZ4012) (Variant A2T1, A2T2, A3Y1, A3Y2)	Report No. <i>LCTR 1558 001</i>	20 Date: 08.01	Date: 08.01.2020	
Brake identifier: 400 x 120		(copy attac	(copy attached)	
	Type-I	Type-III		
Brake force T per axle (N) (See point 4.2.1. of Appendix 1 to Annex VII to Regulation (EU) 2015/68) Axle 1	$T_1 = N/A$ % Fe	$T_1 = 23$	5567.28 N	
Axle 1			567.28 N	
	i			
Axle 3	$T_3 = N/A$ % F e	$T_3 = 23$	3567.28 N	
Predicted actuator stroke (mm) (See point 4.3.1.1. of Appendix 1 to Annex VII to Regulation (EU) 2015/68)				
Axle 1	$s_1 = N/A$	$s_1 = 42 \text{ mm}$		
Axle 2	$s_2 = N/A$		$s_2 = 42 \text{ mm}$	
Axle 3	$s_3 = N/A$		$s_3 = 42 \text{ mm}$	
Average output thrust (N) (See point 4.3.1.2. of Appendix 1 to Annex VII to Regulation (EU) 2015/68)				
Axle 1	$Th_{A1} = N/A$	$Th_{A1} = 121$	24 N	
Axle 2	$Th_{A2} = N/A$		$Th_{A2} = 12124 \text{ N}$	
Axle 3	$Th_{A3} = N/A$		$Th_{A3} = 12124 \text{ N}$	
Braking performance (N) (See point 4.3.1.4. of Appendix 1 to Annex VII to Regulation (EU) 2015/68)				
Axle 1	$T_1 = N/A$	$T_1 = 36573$	N	
Axle 2	$T_2 = N/A$	$T_2 = 36573$	N	
Axle 3	$T_3 = N/A$	$T_3 = 36573$		
	Type-0 subject towed vehicle test result (E)	Type-I hot (predicted)	Type-III hot (predicted)	
Braking performance of vehicle	0.55	N/A	0.47	
(See points 2.3.3, 2.4.3 and 2.5.5 of Annex II to Regulation (EU) 2015/68)				



List of regulatory acts with which the type of vehicle complies

To be filled in only in the case of type-approval in accordance with Article 25(6) of Regulation (EU) No 167/2013

Item	Subject	Regulatory act reference	As amended by	Applicable to version
VEHIC	_ CLE FUNCTIONAL SAFETY REQUIREMENT	S		
1	Vehicle structure integrity	Commission Delegated Regulation (EU) No 2015/208 Annex II	CR (EU) 2018/829	ALL
2	Maximum design speed, speed governors and speed limitation devices	Commission Delegated Regulation (EU) No 2015/208 Annex III		
3	Steering for fast tractors	Commission Delegated Regulation (EU) No 2015/208 Annex IV		
4	Steering	Commission Delegated Regulation (EU) No 2015/208 Annex V		
5	Speedometers	Commission Delegated Regulation (EU) No 2015/208 Annex VI		
6	Field of vision and windscreen wipers	Commission Delegated Regulation (EU) No 2015/208 Annex VII		
7	Glazing	Commission Delegated Regulation (EU) No 2015/208 Annex VIII		
8	Rear-view mirrors	Commission Delegated Regulation (EU) No 2015/208 Annex IX		
9	Driver information systems	Commission Delegated Regulation (EU) No 2015/208 Annex X		
10	Lighting, light signalling devices and their light sources	Commission Delegated Regulation (EU) 2015/208 Annex X	CR (EU) 2018/829	ALL



Item	Subject	Regulatory act reference	As amended by	Applicable to version
VEHIC	CLE FUNCTIONAL SAFETY REQUIREMENT	TS	1	
11	Lighting installation	Commission Delegated Regulation (EU) No 2015/208 Annex XII	CR (EU) 2018/829	ALL
12	Vehicle occupant protection, including interior fittings, head restraints, seat belts, vehicle doors	Commission Delegated Regulation (EU) No 2015/208 Annex XIII		
13	Vehicle exterior and accessories	Commission Delegated Regulation (EU) No 2015/208 Annex XIV	CR (EU) 2018/829	ALL
14	Electro-magnetic compatibility	Commission Delegated Regulation (EU) No 2015/208 Annex XV	CR (EU) 2018/829	ALL
15	Audible warning devices	Commission Delegated Regulation (EU) No 2015/208 Annex XVI		
16	Heating systems	Commission Delegated Regulation (EU) No 2015/208 Annex XVII		
17	Devices to prevent unauthorised use	Commission Delegated Regulation (EU) No 2015/208 Annex XVIII		
18	Registration plates	Commission Delegated Regulation (EU) No 2015/208 Annex XIX	CR (EU) 2018/829	ALL
19	Statutory plates and markings	Commission Delegated Regulation (EU) No 2015/208 Annex XX	CR (EU) 2018/829	ALL
20	Dimensions and trailer masses	Commission Delegated Regulation (EU) No 2015/208 Annex XXI	CR (EU) 2018/829	ALL
21	Maximum laden mass	Commission Delegated Regulation (EU) 2015/208 Annex XXII	CR (EU) 2018/829	ALL
22	Ballast masses	Commission Delegated Regulation (EU) 2015/208 Annex XXIII		



Item	Subject	Regulatory act reference	As amended by	Applicable to version
VEHIC	L LE FUNCTIONAL SAFETY REQUIRI	EMENTS		
23	Safety of electrical systems	Commission Delegated Regulation (EU) No 2015/208 Annex XXIV	CR (EU) 2018/829	ALL
24	Fuel tanks	Commission Delegated Regulation (EU) No 2015/208 Annex XXV		
25	Rear protective structures	Commission Delegated Regulation (EU) No 2015/208 Annex XXVI	CR (EU) 2018/829	ALL
26	Lateral protection	Commission Delegated Regulation (EU) No 2015/208 Annex XXVII		
27	Load platforms	Commission Delegated Regulation (EU) No 2015/208 Annex XXVIII		
28	Towing devices	Commission Delegated Regulation (EU) No 2015/208 Annex XXIX		
29	Tyres	Commission Delegated Regulation (EU) No 2015/208 Annex XXX	CR (EU) 2018/829	ALL
30	Spray-suppression systems	Commission Delegated Regulation (EU) No 2015/208 Annex XXXI		
31	Reverse gear	Commission Delegated Regulation (EU) No 2015/208 Annex XXXII		
32	Tracks	Commission Delegated Regulation (EU) No 2015/208 Annex XXXIII		
33	Mechanical couplings	Commission Delegated Regulation (EU) 2015/208 Annex XXXIV	CR (EU) 2018/829	ALL



Item	Subject	Regulatory act reference	As amended by	Applicable to version
VEHI	CLE BRAKING REQUIREMENTS			
34	Construction and fitting of braking devices and trailer braking couplings	Commission Delegated Regulation (EU) 2015/68 Annex I	CR (EU) 2018/828	ALL
35	Testing and performance of braking systems and trailer braking couplings and of vehicles fitted with them	Commission Delegated Regulation (EU) 2015/68 Annex II	CR (EU) 2018/828	ALL
36	Measurement of the response time	Commission Delegated Regulation (EU) 2015/68 Annex III	CR (EU) 2018/828	ALL
37	Energy sources and energy storage devices of braking systems and trailer braking couplings and to vehicles fitted with them	Commission Delegated Regulation (EU) 2015/68 Annex IV	CR (EU) 2018/828	ALL
38	Spring brakes and vehicles fitted with them	Commission Delegated Regulation (EU) 2015/68 Annex V	CR (EU) 2018/828	ALL
39	Parking braking systems equipped with a mechanical brake-cylinder locking device	Commission Delegated Regulation (EU) 2015/68 Annex VI		
40	Alternative test requirements for vehicles for which Type-I, Type-II or Type-III tests are not mandatory	Commission Delegated Regulation (EU) 2015/68 Annex VII	CR (EU) 2018/828	ALL
41	Testing of inertia braking systems, braking devices and trailer braking couplings and of vehicles fitted with them as regards braking	Commission Delegated Regulation (EU) 2015/68 Annex VIII		
42	Vehicles with hydrostatic drive and their braking devices and braking systems	Commission Delegated Regulation (EU) 2015/68 Annex IX		
43	Safety aspects of complex electronic vehicle control systems	Commission Delegated Regulation (EU) 2015/68 Annex X		
44	Test procedures applying to anti-lock braking systems and to vehicles fitted with them	Commission Delegated Regulation (EU) 2015/68 Annex XI		
45	EBS of vehicles with compressed-air braking systems or of vehicles with data communication via pin 6 and 7 of ISO 7638 connector and to vehicles fitted with such EBS	Commission Delegated Regulation (EU) 2015/68 Annex XII		
46	Hydraulic connections of the singleline type and to vehicles fitted with them	Commission Delegated Regulation (EU) 2015/68 Annex XIII		



Item	Subject	Regulatory act reference	As amended by	Applicable to version
VEHI	CLE CONSTRUCTION AND GENERAL T	YPE-APPROVAL REQUIREMENTS		
47	Arrangements with regard to type- approval procedures, including the requirements relating to virtual testing	Commission Delegated Regulation (EU) No 1322/2014 Annex III		
48	Arrangements with regard to conformity of production	Commission Delegated Regulation (EU) No 1322/2014 Annex IV	CR (EU) 2018/830	ALL
49	Access to repair and maintenance information	Commission Delegated Regulation (EU) No 1322/2014 Annex V	CR (EU) 2018/830	ALL
50	Roll-over protection structures (dynamic testing)	Commission Delegated Regulation (EU) No 1322/2014 Annex VI		
51	Roll-over protection structures (tracklaying tractors)	Commission Delegated Regulation (EU) No 1322/2014 Annex VII		
52	Roll-over protection structures (static testing)	Commission Delegated Regulation (EU) No 1322/2014 Annex VIII		
53	Roll-over protection structures (front mounted roll-over protective structures on narrow-track tractors)	Commission Delegated Regulation (EU) No 1322/2014 Annex IX		
54	Roll-over protection structures (rear mounted roll-over protective structures on narrow-track tractors)	Commission Delegated Regulation (EU) No 1322/2014 Annex X		
55	Falling objects protection structures	Commission Delegated Regulation (EU) No 1322/2014 Annex X		
56	Passenger seats	Commission Delegated Regulation (EU) No 1322/2014 Annex XII		
57	Driver's exposure to noise level	Commission Delegated Regulation (EU) No 1322/2014 Annex XIII		
58	Driving seat	Commission Delegated Regulation (EU) No 1322/2014 Annex XIV		
59	Operating space and to access to the driving position	Commission Delegated Regulation (EU) No 1322/2014 Annex XV		
60	Power take-offs	Commission Delegated Regulation (EU) No 1322/2014 Annex XVI		
61	Protection of drive components	Commission Delegated Regulation (EU) No 1322/2014 Annex XVII		
62	Seat-belt anchorages	Commission Delegated Regulation (EU) No 1322/2014 Annex XVIII		
63	Safety belts	Commission Delegated Regulation (EU) No 1322/2014 Annex XIX		
64	Protection against penetrating objects	Commission Delegated Regulation (EU) No 1322/2014 Annex XX		
65	Exhaust system	Commission Delegated Regulation (EU) No 1322/2014 Annex XXI		



Item	Subject	Regulatory act reference	As amended by and/or stage of implementation	Applicable to version	
VEHI	VEHICLE CONSTRUCTION AND GENERAL TYPE-APPROVAL REQUIREMENTS				
66	Operator's manual	Commission Delegated Regulation (EU) No 1322/2014 Annex XXII	CR (EU) 2018/830	ALL	
67	Control devices, including safety and reliability of control systems and emergency and automatic stop devices	Commission Delegated Regulation (EU) No 1322/2014 Annex XXIII			
68	Protection against other mechanical hazards	Commission Delegated Regulation (EU) No 1322/2014 Annex XXIV	CR (EU) 2018/830	ALL	
69	Guards and protective devices	Commission Delegated Regulation (EU) No 1322/2014 Annex XXV			
70	Information warnings and markings	Commission Delegated Regulation (EU) No 1322/2014 Annex XXV	CR (EU) 2018/830	ALL	
71	Materials and products	Commission Delegated Regulation (EU) No 1322/2014 Annex XXVII			
72	Batteries	Commission Delegated Regulation (EU) No 1322/2014 Annex XXVIII			
73	Protection against hazardous substances	Commission Delegated Regulation (EU) No 1322/2014 Annex XXIX			
74	Performance standards and assessment of technical services	Commission Delegated Regulation (EU) No 1322/2014 Annex XXX			
ENVIRONMENTAL AND PROPULSION UNIT PERFORMANCE REQUIREMENTS					
75	EU type-approval of a type of engine or engine family for an agricultural and forestry vehicle type as a separate technical unit regarding the pollutants emitted	Commission Delegated Regulation (EU) 2018/985 Annex I			
76	EU type-approval of an agricultural and forestry vehicle type equipped with an engine type or engine family regarding the pollutants emitted	Commission Delegated Regulation (EU) 2018/985 Annex II			
77	External sound emission	Commission Delegated Regulation (EU) 2018/985 Annex III			



Date of issue:

<u>e24*167/2013*00281*00</u>

Index to the Information Package

01st December, 2020.

Date of latest amendment:		N/A
Reason	for extension/revision:	N/A
1.	Additional conditions, and advisory	
	notes on legal alternatives	
2.	Test report(s)	
	- numbers(s):	20-TAMO-0239
	- date of issue:	03.11.2020
	- date of latest amendment:	N/A
3.	Information document	
	- number(s):	167/2013-PC-00
	- date of issue:	04.02.2020
	- date of latest amendment:	N/A
	Documentation:	1396 pages



<u>e24*167/2013*00281*00</u>

Appendix: Additional conditions, and advisory notes on legal alternatives

A: Additional conditions:

- 1. The attached technical report, with any of its attachments, forms part of this Type Approval certificate.
- 2. Each individual vehicle from series production shall be manufactured as specified in the attached drawings, and shall only be fitted with the components and parts specified in the Approval documents.
- 3. Changes in the vehicle are permitted only with the explicit permission of NSAI. Breaches of this requirement will lead to a withdrawal of the Type Approval, and in addition may be subject to criminal prosecution.
- 4. At regular intervals, any tests or associated checks prescribed by the applicable legislation to verify continued conformity with the approved type shall be carried out. The manufacturer shall demonstrate compliance with this by submitting to NSAI evidence of adequate arrangements and documented control plans for each type to be approved.
- 5. Any set of samples or test pieces showing evidence of non-conformity shall give rise to further sampling and testing and all steps shall be taken to restore conformity of production.
- 6. This Type Approval will expire when it is surrendered by the holder, or withdrawn by NSAI, or when the approved type of vehicle no longer conforms to legal requirements. The recall of the Type Approval can be issued by NSAI when the conditions required for the issuing or continuation of the Type Approval are no longer current, or when the Approval holder is in breach of the duties attached to the Type Approval, or when it is established that the approved type no longer meets the requirements of traffic safety.
- 7. Changes in the company name, address or manufacturing site, as well as in any of the sales or other agents specified in the issuing of the approval must immediately be notified to NSAI.
- 8. The duties imposed by the issuing of this certificate are not transferable. The legal protection of third parties is not affected by this certificate.
- 9. When the manufacture or sale of the vehicle has not been started within one year of the date of issue of this certificate, then NSAI is to be informed. This requirement also applies when the manufacture or sale has been halted for more than one year, or when it ought to have been halted for more than one year. The initial commencement of manufacture or sale, or the resumption of manufacture or sale, shall then be notified to NSAI within one month of commencement or resumption.

B: Legal Options:

Any objection to the requirements set out in this certificate shall be made within one month of the date of issue. The objection shall be made, in writing, to NSAI in Dublin.