

CLEPA statement concerning the description of Crash test dummies and Validation tools in UN Regulations and GTRs.

Clepa is concerned by the lack in the Mutual Resolution M.R.1. of specific descriptions of crash test dummies which are essential for the correct application of UN Regulations and GTRs.

When the mutual resolution M.R.1 was established, the intention was to add in its annexes the full description of the crash test dummies and validation tools used in UN Regulations or GTRs.

So far, only a placeholder for the Biorid crash dummy and some references for the Worldsid dummy have been annexed to the M.R.1.

The description of the Q-dummies have been published in the informal working group on child restraints, but have not been copied into M.R.1. Changes continue to be introduced to the tools notwithstanding the crash dummies shall be already used for approvals to UNECE R.129.

Modifications of dummies are also ongoing when the dummy has already been published in annexes of M.R.1. like the modifications of the Worldsid dummy as described in Annex 2 of M.R.1. For such changes, the need of transitional provisions shall be considered and the use of the correct build levels of such transitional provisions shall be introduced also in the regulation requesting the use of a dummy.

Clepa recommends to urgently annex the description of all test tools (e.g. the Q-dummy family) to M.R.1.

Clepa recommends to always establish clear and appropriate transitional provisions when changes to build levels of dummies occur, preferably by adding in the corresponding UN regulations or GTRs that make use of such updated dummy the reference to the built level of the tool.

Clepa would like to recommend that UNECE regulations do not require the use of any new or modified test tool until the appropriate description of the crash test dummy or the necessary tool has been annexed to M.R.1.