

**PROPOSAL FOR COLLECTIVE AMENDMENTS TO
REGULATIONS Nos. 14, 16, 17, 29, 32, 33, 34, 42, 44, 80, 94 and 95**

(Clarification of the scopes of the Regulations)

Transmitted by the expert from OICA

Regulation No. 14

1. Paragraph 1, replace by the following text:

"1. SCOPE

This Regulation applies to:

- **Vehicles of categories M and N 1/ with regard to their anchorages for safety belts intended for adult occupants of forward-facing or rearward-facing seats.**
- **Vehicles of categories M1 and N1 with regard to their ISOFIX anchorage systems intended for child restraint systems.**

1/ As defined in the Consolidated Resolution on the Construction of vehicles (R.E.3), Annex 7 (document TRANS/WP.29/78/Rev.1, as last amended)."

2. Paragraph 5.3.1, replace by the following text:

"5.3.1. Any vehicle in categories M and N (except those vehicles of categories M2 and M3 which belong to **Classes I, II or A 1/**) shall be equipped with safety-belt anchorages which satisfy the requirements of this Regulation.

Vehicles of category M1 shall be equipped with ISOFIX anchorage systems, which satisfy the requirements of this Regulation in accordance with paragraph 5.3.10. If ISOFIX anchorage systems are installed in vehicles of category N1, they shall satisfy the requirements of this Regulation.

1/ As defined in the Consolidated Resolution on the Construction of vehicles (R.E.3), Annex 7 (document TRANS/WP.29/78/Rev.1, as last amended)."

Note: in accordance with GRSP-38-5 submitted by OICA, the reference to paragraph 5.3.10 probably needs to be replaced by a reference to paragraph 5.3.9.

3. Justification

Paragraph 1: Text revised to clarify application and move "requirements" from the "scope" to Section 5 – Specifications.

Paragraph 5.3.1: Text revised to:

- Replace reference to other Regulations by reference to RE.3.
- Move ISOFIX installation requirement from scope to main text.

Regulation No. 16

1. Paragraph 1, replace by the following text:

"1. SCOPE

This Regulation applies to:

- **Safety belts and restraint systems designated for installation in vehicles of category M, N, L2, L4, L5, L6, L7 and T */ and are intended for separate use, i.e. as individual fittings, by persons of adult built occupying forward or rearward facing seats;**
- **Vehicles of category M and N with regard to the installation of safety belts and restraint systems;**
- **Vehicles of category M1 and N1 with regard to the installation of child restraint systems**

*/ As defined in the Consolidated Resolution on the Construction of Vehicles (R.E.3), Annex 7 (document **TRANS/WP.29/78/Rev.1, as last amended**)."

2. Paragraph 8.1.1., replace by the following text:

"8.1.1. With the exception of folding seats (as defined in Regulation No. 14) and seating intended solely for use when the vehicle is stationary, the seats of vehicles of categories M and N (except those vehicles of categories M2 and M3 which belong to Classes **I, II or A */**) **shall** be equipped with safety-belts or restraint systems which satisfy the requirements of this Regulation.

***/ As defined in the Consolidated Resolution on the Construction of Vehicles (R.E.3), Annex 7 (document TRANS/WP.29/78/Rev.1, as last amended).**"

3. Justification

Paragraph 1.: The current scope needs some corrections, among others by clearly listing the various vehicle categories for which safety belt component approval may be requested.

The present Regulation does not include approval of child restraint systems, but provides for confirmation of suitability of the provisions in a vehicle for their installation. There is no need to reference ISOFIX in the scope, as this is a sub-set of child restraint systems.

Paragraph 8.1.1.: OICA proposes to delete the reference to Regulations Nos. 36 and 52 and to refer only to R.E.3, which already contains the necessary definitions.

Regulation No. 17

1. Paragraph 1, replace by the following text:

"1. SCOPE

This Regulation applies to:

- **Vehicles of categories M1 and N 1/ with regard to the strength of seats and their anchorages and with regard to their head restraints;**
- **Vehicles of categories M2 and M3 1/ with regard to seats not covered by Regulation No. 80, in respect of the strength of seats and their anchorages, and in respect of their head restraints.**
- **Vehicles of category M1 with regard to the design of the rear parts of seat backs and the design of devices intended to protect the occupants from the danger resulting from the displacement of luggage in a frontal impact.**

It does not apply to folding, side-facing or rearward-facing seats, or to any head restraint fitted to these seats.

1/ As defined in the Consolidated Resolution on the Construction of Vehicles (R.E.3.), Annex 7 (document **TRANS/WP.29/78/Rev.1, as last amended**)."

2. Paragraph 1., delete the footnote 2/
3. Paragraph 4.4.1., renumber footnote 3/ as footnote 2/
4. Paragraph 5.1., renumber footnote 4/ as footnote 3/
5. Paragraph 5.1.3.2., replace by the following text:

"5.1.3.2. The requirements of paragraph 5.1.3. shall not apply to rearmost seats, **to back-to-back seats or to seats that comply with the provisions of Regulation No. 21 "Uniform Provisions concerning the Approval of Vehicles with regard to their Interior Fittings" (E/ECE/324-E/ECE/TRANS/505/Rev.1/Add.20/Rev.2, as last amended).**"

6. Paragraph 5.1.4.1.2., replace by the following text:

"5.1.4.1.2. Rearmost seats, **to back-to-back seats or to seats that comply with the provisions of Regulation No. 21 "Uniform Provisions concerning the Approval of Vehicles with regard to their Interior Fittings" (E/ECE/324-E/ECE/TRANS/505/Rev.1/Add.20/Rev.2, as last amended);**"

7. Justification

It is proposed to clarify the scope, by clearly separating the various vehicle categories.

ECE Regulation No. 17 does not provide for component approval of luggage restraints, which may be implied from the present text.

Reference to the 01 Series in respect of Regulation No. 80 is no longer necessary.

The derogation for seats complying with Regulation No. 21 should be moved from the "scope" to the "requirements".

Regulation No. 29

The EU proposal contained in document TRANS/WP.29/GRSP/2005/13 can be supported.

Regulation No. 32

The EU proposal contained in document TRANS/WP.29/GRSP/2005/13 can be supported.

Regulation No. 33

The EU proposal contained in document TRANS/WP.29/GRSP/2005/13 can be supported.

Regulation No. 34

The EU proposal contained in document TRANS/WP.29/GRSP/2005/13 can be supported.

Regulation No. 42

1. Paragraph 1, replace by the following text:

"1. SCOPE

This Regulation applies to vehicles of category M1 with regard to the behaviour of their front and rear protective devices when involved in a collision at low speed."

2. Justification

OICA believes that this proposal better describes the parts covered by Regulation No. 42, namely the front and rear bumpers, which are only covering low collision speeds.

Regulation No. 44

The EU proposal contained in document TRANS/WP.29/GRSP/2005/13 can be supported. Possibly, however, a reference to 3-wheelers might need to be re-introduced.

Regulation No. 80

1. Paragraph 1, replace by the following text:

"1. SCOPE

- 1.1. This Regulation applies to:

- **Passenger seats for forward facing installation in vehicles of Categories M2 and M3, of Classes II, III and B */;**
- **Vehicles of Categories M2 and M3 of Classes II, III and B */ in respect of their passenger seat anchorages and seat installation.**

- 1.2. As an alternative to this Regulation and at the request of the manufacturer, vehicles of Category M2 may be approved to Regulation No. 17.

*/ As defined in the Consolidated resolution on the Construction of vehicles (R.E.3), Annex 7 (document **TRANS/WP.29/78/Rev.1, as last amended**)."

2. Justification

OICA proposes to delete the reference to Regulations Nos. 36 and 52 and to refer only to RE.3, which already contains the necessary definitions. This alleviates the need to add reference to Regulation No. 107.

Regulation No. 80 was developed at a time when belted occupancy was unusual in buses and is based on a seat designed to collapse in a controlled manner to absorb the impact of a passenger behind on the assumption that it is unoccupied because its occupant is already impacting the seat in front. ECE Regulation No. 14 also recognises that the upper belt anchorage point will move far more on a Regulation No. 80 seat than on a Regulation No. 17 seat.

Regulation No. 80 recognises that M2 is a mixed regime for vehicle construction (small van-based as M1/N1 and body-built as M3) and thus the requirements reflect this, giving manufacturers of M2 vehicles a free choice of complying with Regulation No. 17 or Regulation No. 80.

The current paragraph 1.3. however suggests that vehicles using the existing derogation in Regulation No. 14 (and therefore having "collapsible" seats, must use Regulation No. 80 only. OICA believes that this simply reflects the fact that current technology does not allow such collapsible seats to meet the Regulation No. 17 requirements and that in this case, Regulation No. 80 is the only possibility.

OICA however suggests deleting this paragraph 1.3. altogether, since it creates more confusion than it adds clarification.

Finally, the scope should be restructured, by referring to the approval of seats and to the approval of vehicles in respect of their seat anchorages and seat installation.

Regulation No. 94

1. Paragraph 1, replace by the following text:

"1. SCOPE

This Regulation applies to: power-driven vehicles of category M1 ^{1/} of a total permissible mass not exceeding 2.5 tonnes; **other** vehicles may be approved at the request of the manufacturer.

1/ As defined in the Consolidated resolution on the Construction of vehicles (R.E.3), Annex 7 (document **TRANS/WP.29/78/Rev.1, as last amended**)"

2. Justification

Deletion of the existing paragraph 1.2. is acceptable, provided it is clarified that the manufacturer may request approval for vehicles other than M1 below 2.5 tonnes.

Regulation No. 95

The current scope seems appropriate.

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