

## **Proposal for amendment to Regulation No. 11 (Door latches and hinges)**

Note: The text reproduced below was prepared by the expert from Germany in order to introduce safety requirements for occupants in case of a vehicle being equipped with a full lock system. The modifications to the existing text of Regulation No. 11 are marked in **bold** or strikethrough characters.

### **I. Proposal**

*Paragraph 2.7, amend to read:*

2.7. ~~"Child Safety Lock System" is a locking device which can be engaged and released independently of other locking devices and which, when engaged, prevents operation of the interior door handle or other release device. The lock release/engagement device may be manual or electric and may be located anywhere on or in the vehicle.~~

„Additional lock systems“

*Insert new paragraphs:*

**“2.7.1 "Child Safety Lock System" is a locking device which can be engaged and released independently of other locking devices and which, when engaged, prevents operation of the interior door handle or other release device. The lock release/engagement device may be manual or electric and may be located anywhere on or in the vehicle.**

**2.7.2 " Full Lock System" is a locking device for an additional protection against unauthorised use, which in case of being activated prevents the vehicle doors from being opened from inside of the vehicle.**

**2.7.3 “Emergency Unlock System” is a release device, which in case of an emergency allows any occupant of the vehicle to exit the vehicle through all doors located next to passenger seats.”**

*Insert new paragraphs:*

**“6.3.2 Each door may be equipped with a full lock system. The activation of this system shall only be possible if no occupant stays in the vehicle.**

**6.3.3 Notwithstanding paragraph 6.3.2, a full lock system may be activated when an occupant stays in the vehicle, if the vehicle is equipped with an easy detectable emergency unlock sytem in the interior of the vehicle.”**

*Renumber paragraphs 6.3.2 to 6.3.3 accordingly.*

## II. Justification

Protection against unauthorised use is an important topic that has to be dealt with regarding the larceny of vehicles or of items from inside of a vehicle. In the past years this has led to the situation that protection against unauthorised use has become dominating compared to the protection of occupants.

While the statistics on larceny of vehicles show a positive trend in Germany for the past decade, it is recognisable that customers complain about the situation that vehicles can be fully locked off with a certain risk to occupants staying in the vehicle. This situation is driven mainly due to requirements coming from insurance companies that reward the installation of enhanced anti-theft systems in vehicles with a better rating for the vehicle insurance tariffs.

Current regulatory requirements allow the installation of lock systems in road vehicles except for buses and coaches that make it unable to escape from a vehicle in case of an emergency. It is allowed to install lock systems, which fully lock every door and window in a vehicle in combination with the deactivation of any unlock device in the interior. For this case the only possibility for any occupant to open a vehicle would be breaking a window.

An analysis of the current situation in Germany on the larceny of vehicles shows that no significant difference can be found between the larcenies of vehicles having a full lock system on board and the vehicles which do not have such systems. The installation of a full lock system is therefore no evidence for a better protection against unauthorised used compared to other measures with the same ambition.

This document is proposing an amendment to regulation no. 11 which allows the installation of full lock systems without compromising the safety and protection of road vehicle occupants. The technologies currently available allow the combination of full lock systems with a full level of safety for occupants.

The emergency unlock system (paras. 2.7.3. and 6.3.3.) can be any device in the vehicle. It is covered e.g. by a door handle, an unlock switch or any other additional device in the interior of the vehicle.

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