

Submitted by the expert from India

Informal document **GRSG-108-41**  
(108th GRSG, 4 - 8 May, 2015  
agenda item 18(b))

## UN Regulation No. 34 – Prevention of fire risks

### **Proposal for the 03 series of amendments to Regulation No. 34 (Prevention of fire risks)**

India's comments on Doc ECE/TRANS/WP.29/2014/65. The modifications to the current text in the proposal are marked in bold for new characters and strike through for deletion.

#### **I. Proposal in document - ECE/TRANS/WP.29/2014/65**

“1.2. Part II-1: At the request of the manufacturer, to the approval of vehicles of categories M, N and O approved to Part I or IV of this Regulation fitted with liquid fuel tank(s) with regard to the prevention of fire risks in the event of a frontal and/or lateral collision as well as to the approval of vehicles of categories M1 and N1, which are of a total permissible mass exceeding ~~2.8~~ **2.5** tonnes, and categories M2, M3, N2, N3 and O, fitted with tank(s) for liquid fuel, which have been approved to Part I or IV of this Regulation with regard to the prevention of fire risks in the event of a rear collision.

Part II-2: To the approval of vehicles of categories M1 and N1, which are of a total permissible mass not exceeding ~~2.8~~ **2.5** tonnes, fitted with liquid fuel tank(s) approved to Part I or IV of this Regulation with regard to the prevention of fire risks in the event of a rear collision.”

#### **II. Justification**

In the proposal, Part II-2 proposes,

- 1) rear impact to be mandatory for M1, N1 category vehicles, and
- 2) the applicability is proposed for M1, N1 vehicles with GVW < 2.8 T .

India would like to suggest with respect to point 2 above, if point no. 1 is agreed in GRSG 107<sup>th</sup> session as proposed Part II- 2 of ECE R34.

1. In the EU and Indian crash regulations, wherever the applicability is based on GVW for M1 and N1, the threshold value used uniformly is 2.5 tonnes. The list of regulations is as follows :

<b>Sr.</b>	<b>Particulars</b>	<b>EU Regulations</b>	<b>Indian Standard</b>
1	Offset Frontal Impact	ECE R 94	AIS 098
2	Pedestrian Impact	EU 78/2009, ECE R 127	AIS 100
3	Steering Impact	-	AIS 096

2. 2.8 tonnes threshold for applicability as proposed in R34 rear impact proposal, will create non- uniformity in EU crash legislation and model compliance.

This will lead to non- coherent product development for crash compliance for M1, N1 models, particularly for models between GVW 2.5 tonnes and 2.8 tonnes.

Hence, to align and maintain weight uniformity with other EU and Indian crash regulations for M1, N1 category, India proposes that R34 applicabilty should be M1 , N1 vehicles below 2.5 tonnes instead of 2.8 tonnes as porposed.

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