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## Proposal for the 10 series of amendments to UN Regulation No. 17 (Strength of seats)

### Agenda Item 9

#### Submitted by the expert from Japan, the Netherlands, and the European Commission\*

The text reproduced below was prepared by the expert from Japan, the Netherlands, and the European Commission to remove an unnecessary paragraph of transitional provision from the official document ECE/TRANS/WP.29/GRSP/2019/27. The modification to the ECE/TRANS/WP.29/GRSP/2019/27 is marked in strikethrough character.

### I. Proposal

*Paragraphs 13.14 shall be deleted.*

- 13.13. As from the official date of entry into force of the 10 series of amendments, no Contracting Party applying this UN Regulation shall refuse to grant or refuse to accept UN type approvals under this UN Regulation as amended by the 10 series of amendments.
- 13.13.1. As from [1 September 2021,] Contracting Parties applying this UN Regulation shall not be obliged to accept UN type approvals to the preceding series of amendments that were first issued on or after [1 September 2021.]
- 13.13.2. Until [1 September 2023,] Contracting Parties applying this UN Regulation shall accept UN type approvals to the preceding series of amendments that were first issued before [1 September 2021.]
- 13.13.3. As from [1 September 2023] Contracting Parties applying this Regulation shall not be obliged to accept type approvals issued to the preceding series of amendments to this Regulation.
- 13.13.4. ~~Notwithstanding paragraph 13.13.3., Contracting Parties applying the UN Regulation shall continue to accept UN type approvals to the preceding series of amendments to the UN Regulation, for vehicles which are not affected by the changes introduced by the 10 series of amendments.~~
- 13.13.5. Contracting Parties applying this UN Regulation shall not refuse to grant UN type approvals according to any preceding series of amendments to this UN Regulation or extensions thereof.

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\* In accordance with the programme of work of the Inland Transport Committee for 2018–2019 (ECE/TRANS/274, para. 123 and ECE/TRANS/2018/21/Add.1, Cluster 3.1), the World Forum will develop, harmonize and update UN regulations to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.



## II. Justification

The experts of Japan, NL and the EC would like to delete paragraph 13.3.4. due to the fact that it becomes very difficult to judge whether an approval according to the preceding series of amendments is still valid. For category M1 vehicle types, update to ECE R17.10 always applies, because these vehicles are always fitted with head restraints, at least on the front outboard seats. (unless of course, you have an M1 vehicle type with only a front centre seat not equipped with a head restraint, but I guess this is a very theoretical example...)

For the other vehicle categories, you would have to go dig into the approval to verify whether there are any seats equipped with head restraints and if so, whether they are approved based upon the requirements in ECE R17 or those of ECE R25.04.

This is all very complicated and therefore it seems reasonable to have the approvals updated regardless. Also, because there are not many vehicle types with driver seats without head restraints or head restraints approved to ECE R25.04 these days.

Deletion of paragraph 13.13.4. would be a small additional burden and cost for manufacturers that have an existing ECE R17 approval which is not affected by the changes of ECE R17.10, but a simplification for all Contracting Parties that are signatory to ECE R17.10.

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