



Australian Government
**Department of Transport and
Regional Services**

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**AUSTRALIAN COMMENTS REGARDING TRANS/WP.29/2003/85
PROPOSAL FOR DRAFT SUPPLEMENT 1 TO THE 02 SERIES OF
AMENDMENTS TO REGULATION No. 95**

Draft supplement 1 to the 02 series of amendments to UNECE Regulation 95 proposes the introduction of a revised dummy, ES-2 (EuroSID-2), to replace the existing dummy, EuroSID, after a transition period.

Australia supports harmonisation and currently accepts the technical requirements of both UNECE R95 and US FMVSS 214 for demonstration of compliance with Australian Design Rule 72/00 Dynamic Side Impact Occupant Protection.

It is not yet known whether ES-2, or possibly a modified version of this dummy, will be introduced into US FMVSS 214. Thus, the way forward for harmonisation of side impact regulations is not clear.

Vehicle manufacturers require stability of specification of test procedures and do not wish to see a quick succession of changes to the specification of regulatory dummies. At present, UNECE Regulation requires the use of the EuroSID dummy, whereas US FMVSS 214 requires the DOT SID dummy. The ES-2 dummy is currently used by EuroNCAP for side impact crashworthiness assessment. The Insurance Institute for Highway Safety uses the 5th percentile female SIDIIs dummy. Considerable resources have been invested in the development of both ES-2 and WorldSID with the aim of harmonisation.

The International Harmonised Research Activities (IHRA) Side Impact Working Group has recommended a suite of tests, including a mobile barrier to vehicle test with a 5th percentile adult female dummy and a car to pole test with a 50th percentile adult male dummy. It is hoped that validation of the proposed IHRA side impact test procedures will lead to globally harmonised side impact regulations. The development of WorldSID is an important support activity for this work, bearing in mind that the dummy is not yet fully evaluated and not yet able to be adopted for regulatory use, nor is it available as a 5th percentile adult female.

The phasing out of EuroSID and the mandatory use of ES-2 as currently proposed is likely to delay the possible introduction of WorldSID and hinder further opportunities for harmonisation. Hence, Australia suggests that the introduction of ES-2 into Regulation 95 could proceed, with ES-2 and EuroSID acceptable to be used as alternative dummies (at the manufacturer's option). However, instead of phasing out EuroSID and mandating the use of ES-2 [36] months after entry into force of Supplement 1, we propose that work be progressed as quickly as possible to evaluate WorldSID for introduction into Regulation 95 to replace EuroSID and ES-2 within this same time frame. This proposed implementation could be achieved by the deletion of new paragraphs 10.4 and 10.5 in TRANS/WP.29/2003/85 and an agreement to evaluate WorldSID as a near term activity. This would likely assist longer-term harmonisation efforts.