

**Informal Document N° GRSP-34-16**

(34th GRSP, 8-12 December 2003,  
agenda item B.5.4)

**Proposal for a new Regulation on Partitioning Systems**

Transmitted by the expert from CLEPA

**A. Note :**

This document refers to Informal Document Nr 02 to GRSP 31<sup>st</sup> session: component tests and homologation of Partitioning Systems in vehicles.

Informal 2 to GRSP/31 was proposed as an Amendment to Regulation No 17 (Strength of Seats), since this Regulation already provides for the possibility of testing and homologation of Partitioning Systems, but only when these systems are supplied as standard equipment by the vehicle manufacturer. In the actual Regulation No 17 Partitioning Systems are tested in a dynamic full car body test under the responsibility of the vehicle manufacturer.

The intention of Informal 2 to GRSP/31 was to add to Regulation No 17 component tests for Partitioning Systems in order to safeguard the end-user of a tested and approved system, whenever and wherever, he/she buys a system along the total supply chain. Thus not only when a Partitioning System is supplied as standard equipment, but also when bought as non-original equipment part (after market).

**B. Proposal**

Regulation No 17 mainly regulates the strength of seats and Partitioning Systems under responsibility of the vehicle manufacturer.

Component testing for Partitioning Systems as non-standard products would be the responsibility of the manufacturer of the Partitioning System.

For this reason we propose to prepare a separate new Regulation for Partitioning Systems supplied as non-original equipment.

GRSP 34 is requested to approve the intention of this Informal Document so that, after approval we will prepare a full Document for a new Regulation, to be offered to GRSP 35 in May 2004.

**C. Modification to Proposal in Informal 2 to GRSP/31 (dynamic sledge tests)**

The only difference between the intention of Informal 2 to GRSP/31 and this new Informal Document is that in Informal 2 to GRSP/31 it was proposed to perform static tests to verify the quality and strength of the Partitioning Systems.

This Informal Document suggests to replace static tests by a dynamic sledge test under the new Regulation

**D. Consideration and Justification of the Proposal for a new Regulation**

Consideration

The status of the Partitioning System in the vehicle is somewhat confusing at this moment. Partitioning Systems are only added in the Regulation No 17, which controls basically the strength of seats and seatbacks.

A vehicle may be granted homologation when the seats are tested with a Partitioning System fitted, if this system is supplied as standard equipment. However there are no separate specifications as to the strength of the Partitioning System.

The Partitioning System that is used during homologation must be identical in all future production.

Furthermore, where a Partitioning System is fitted as a non-original equipment addition to a vehicle, there is no way that the user can be sure that the product will perform as required.

A practical concern is that the manufacturers of Partitioning Systems can only prove the conformity of their systems to the Regulation by a dynamic full car body test, complete with seats. Besides the fact that it is almost impossible for a supplier to arrange a full scale dynamic vehicle test, this supplier does not have any control on the body attachments in the vehicle to secure the Partitioning System.

The new European automotive block exemption, which came into force on October 2003, makes it even more important to safeguard the final customer when he does not receive a vehicle supplied with a standard equipped Partitioning System.

He/she will have the choice to buy a Partitioning System:

- a. separately from the car-manufacturer
- b. direct from the original supplier to the car-manufacturer
- c. from any other source

And none of these sources will have to comply to any Regulation concerning the strength and quality of the Partitioning System.

In GRSP 31 it was already suggested by the German representative to consider a separate Regulation for Partitioning Systems.

All this considered means that we are of the opinion that there is a need to prepare separate specifications for Partitioning Systems, not supplied as original equipment, under a new Regulation.

## Justification

1. there is no doubt that the installation of a Partitioning System, between the luggage area and the passengers in motor vehicles, with seatbacks up-right or folded down, reduces or eliminates injuries, caused by displaced luggage during an emergency stop or a frontal impact.
2. according to the actual Regulation nr 17, Partitioning System may only be tested in case the vehicle manufacturer supplies such a system as standard equipment.
3. In the majority of vehicles however the vehicle manufacturer provides for attachment points for a Partitioning System, but, mainly for commercial reasons, Partitioning Systems are not always supplied as original equipment.
4. this means that the end-users who want to buy a Partitioning System as a non-standard product, will not be assured of the technical abilities (safety) of such a system, since there is no need to comply with any specification.
5. In our opinion the end-user of a vehicle should have the possibility to purchase and install a (safe) Partitioning System at any point during the lifetime of a vehicle.
6. the only way to assure the end-user that he installs a safe product, is to subject this product to comparable technical requirements as required by Regulation no 17 by a new Regulation on Component testing of Partitioning Systems.
7. A comparison can be made with the Regulations on safety belts (Regulation No. 16), which are also tested as separate components, and not only as an integral part of a vehicle.
8. We are of the opinion that a dynamic sledge test gives a more realistic comparison with a dynamic full car body test (R17). Better than by way of static tests as proposed in Informal 2 to GRSP/31.  
CLEPA can support the conformity of dynamic sledge tests versus dynamic full car body tests, by documentation of many test results.
9. In GRSP 31, the representatives of OICA and Germany already expressed their preference to dynamic testing compared to static testing.