

SUBJECT: DRAFT CONSOLIDATED RESOLUTION ON COMMON DEFINITIONS AND PROCEDURES TO BE USED IN GLOBAL TECHNICAL REGULATIONS

Ref. Document No.: TRANS/WP.29/2004/25

INDIA'S COMMENTS

PROPOSAL I :

The proposed categorization of 3 wheelers as per Para 2.1.4 of Annex II does not have any upper limit for GVW. It is therefore proposed to include the upper limit of 1500 kg Gross Vehicle Weight.

Justification:

Three wheelers are being used to a large extent in India, as is common in the other developing countries also. The annual production of three wheelers in India is about 0.3 million of which about two third are passenger carriers and the rest are goods carriers. Of late, three wheelers using alternate fuels using CNG or LPG are also becoming popular. While the safety regulations for three wheelers worked out in India has been largely based on the ECE regulations and EEC directives, due to the large population of three wheelers, the emission regulations have been India specific, which are more stringent than those of ECE and EU.

One of the issues India had to address while preparing the safety regulations was limiting the GVW of three wheelers and it is felt that a limit of maximum mass of three wheelers should be built into the definition. As this parameter is an important factor for developing various GTR's on safety features, complexities would occur while developing them for want of a uniform limit, especially if different members adopt different values for this limit.

In the Indian regulations, the value of 1500kg for both passenger and goods carrying three wheelers has been adopted considering the following.

EU has imposed limitations on the unladen and pay mass for three wheelers (tricycles) vide directive 93/93/EEC. In India, passenger carrying three wheelers are used as a very popular

urban mode of intermediate transport and have capacities up to 6 passengers. Hence the EU limits of 300kg for the pay mass was not suitable to the Indian conditions.

In the case of goods carrying three wheelers, the EU limits for unladen and pay masses add up to gross vehicles mass of 2500kg, which is too high considering the safety on the road. It was also felt that limiting the gross vehicle mass would give a better flexibility of design of the vehicle and would provide adequate safety and economical operations and therefore gross vehicle mass has been limited to 1500kg.

PROPOSAL II :

Agricultural Tractors should be included in the categorization of vehicles

Justification

India being an agricultural country, tractors are very widely used across the country. These vehicles are required to perform various field operations. During their operations, tractors are not confined to the fields but they also ply on road. Present safety regulations as well as emission regulations in India therefore specifically cover agricultural tractors also. In EU also there are regulations covering agricultural tractors.

It is therefore proposed to make provision of covering tractors in the vehicle categorization.

PROPOSAL III:

(Ref: Annexure 3, para 2.2)

While defining Unladen Vehicle Mass, vehicles running on alternate fuels should also be considered.

Justification

Definition requires that fuel tank should be filled to at least 90% of rated capacity. In case of CNG/ LPG fueled vehicles, the Safety Rules prevailing in India restrict the filling of fuel to 80% of the tank capacity. Such vehicles are required to be fitted with fuel cut-off valve set at 80% limit.

It is therefore not possible to fill it up to 90% tank capacity. This may be considered while defining Unladen mass of vehicle running on alternate fuel.

PROPOSAL IV:

(Ref. Annex 2, para 1.3.1)

The condition should appear as below:-

$$\text{Pay Mass} = P - (M + N \times 68) > \text{N} \times 68 \text{ 150 kg}$$
$$N \leq 6$$

This is in line with condition given to classify vehicles to category 2 i.e.

“ Pay mass as defined in paragraph 7 of annex 3 exceeds 150 kg for the vehicle , as configured with the maximum mass of factory fitted optional equipment , the vehicle shall be deemed to be a category 2 vehicle ”.
