

## **Comments on ECE/TRANS/WP.29/GRSG/2017/22 – proposal for amendments to Regulation No. 67 (LPG vehicles) from Turkey**

The text reproduced below was prepared by OICA as a counter proposal to ECE/TRANS/WP.29/GRSG/2017/22. Differences with ECE/TRANS/WP.29/GRSG/2017/22 appear underlined.

### **I. Proposal**

*Insert new paragraphs 2.21. to read:*

**"2.21. "Service life" means the life in years during which the containers may safely be used."**

*Paragraph 4.3., insert new items (i) and (j) to read:*

"4.3. Every container ...

...

**(i) End of service life of the container (Month/Year)**

**(j) Date of production (Month/Year)"**

*Insert a new paragraph 6.15.10.8., to read:*

**"6.15.10.8. The filling unit shall not be located under the floor or the chassis of the vehicle. The centre of outlet of filling unit shall be above 350 mm from the ground surface when the vehicle is in its reference mass. In the case the outlet of filling unit is located between 350 mm to 1,200 mm above the ground and directed downwards, in vertical plane the angle between horizontal road surface and outlet plane of the filling unit shall be equal to or greater than 60 degrees."**

*Insert new paragraphs 22.6. to 22.10., to read:*

**"22.6. As from the official date of entry into force of the 02 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 02 series of amendments.**

**22.7. As from 1 September 2019, Contracting Parties applying this UN Regulation shall not be obliged to accept UN type-approvals to the preceding series of amendments, first issued after 1 September 2019.**

**22.8. Until 1 September 2020, Contracting Parties applying this UN Regulation shall accept UN type-approvals to the**

preceding series of amendments, first issued before 1 September 2019.

22.9. As from 1 September 2020, Contracting Parties applying this UN Regulation shall not be obliged to accept type-approvals issued to the preceding series of amendments to this Regulation.

22.10. 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."

*Annex 10, insert new paragraph 1.8., to read:*

**"1.8. Service life**

**The service life for which containers are safe shall be specified by the container manufacturer considering that external surfaces of the container may be inadvertently exposed to:**

- (a) water, either by intermittent immersion or road spray;**
- (b) salt, due to the operation of the vehicle near the ocean or where ice melting salt is used;**
- (c) impact of gravel; and**
- (d) automotive fluids, including gasoline, hydraulic fluids, glycol and oils.**

**[The maximum service life for a container located outside and underneath the vehicle shall be 15 years.]"**

## **II. Justifications**

1. Taking into consideration the justifications provided by Turkey, the maximum service life of 15 years must be discussed with container manufacturers according to their technologies.

2. As most of the physical aggressions as listed in ECE/TRANS/WP.29/GRSG/2017/22 are relevant for containers located outside and under the vehicle, only these might have a regulated maximum service life if necessary at all.

3. As the proposal introduces new requirements, it needs transitional provisions.

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