

A proposal for modifications to document TRANS/WP.29/GRSG/2005/25

A. PROPOSAL

1.1. This regulation applies to

- **approval of seats for forward facing installation in vehicles of Categories M2 and M3, of Classes II, III and B (1);**
- **approval of vehicles of Categories M2 and M3 of Classes II, III and B (1) in respect of their seat anchorages and seat installation.**

1.2. As an alternative to this Regulation and at the request of the manufacturer vehicles of Category M2 (**with the exception of vehicles where some seats benefit from the derogation provided in Paragraph 7.4. to Regulation No. 14**) may be approved to Regulation No. 17.

(1) As defined in the Consolidated resolution on the Construction of vehicles (R.E.3), Annex 7 (document TRANS/WP.29/78/Rev.1/**Amend.2**)

(Present text, for information:

1.1. This regulation applies to seats in vehicles of Categories M2 and M3 (1), except vehicles of Class I, as defined in Paragraph 2.1.1. of Regulation No. 36 and Class A, as defined in Paragraph 2.1.1. of Regulation No. 52, in respect of:

1.1.1. Every passenger seat intended to be installed facing forwards

1.1.2. The seat anchorages provided in the vehicle and intended to be fitted with the seats indicated in Paragraph 1.1. or any other type of seat likely to be fitted on these anchorages.

1.2. As an alternative to this Regulation and at the request of the manufacturer vehicles of Category M2 may be approved to Regulation No. 17.

1.3. Vehicles where some seats benefit from the derogation provided in Paragraph 7.4. to Regulation No. 14 shall be approved to this Regulation.)

B. JUSTIFICATION

In the EU, we have a single document, 74/408/EEC (as amended). In the ECE, we have two documents ECE-17 and ECE-80. It is this difference that causes some of the problems in GRSG/2005/25.

Both EU and ECE texts recognise that M2 is a mixed regime for vehicle construction (small van-based as M1/N1 and body-built as M3) and thus the regulations reflect this (ECE-17 or ECE-80 for M2, ECE-80 for M3).

ECE-80 was developed at a time when belted occupancy was unusual in buses and is based on a seat designed to collapse in a controlled manner to absorb the impact of a passenger behind on the assumption that it is unoccupied because its occupant is already impacting the seat in front. ECE-14 also recognises that the upper belt anchorage point will move far more on an ECE-80 seat than on an ECE-17 seat.

ECE-17 is based on having as strong a seat back as possible to absorb luggage loads from behind (where relevant) and restrict the movement of the seat belt reference points.

In changing the scope of ECE-80, the Commission proposes deleting paragraphs 1.2 and 1.3. This is not acceptable, as these clauses take account of the factors mentioned above and align with equivalent text in 74/408/EEC. We must retain the objectives of 1.2 (the intention is to give manufacturers of M2 vehicles a free choice of complying with ECE-17 or ECE-80 as in 74/408/EEC as amended) and 1.3 (the intention was to replicate the EU provision which takes account of a conflict between reducing the load on the belted occupant in an impact and the energy-absorbing objective of the ECE-80 seat which was designed for unbelted passengers).

In addition, we must delete reference to Regulations 36 and 52 and refer only to RE3, which already contains the necessary definitions. This alleviates the need to add reference to ECE-107.

The proposal should refer to approval of seats and approval of vehicles in respect of their seat anchorages and seat installation.