

Japanese comments on ECE/TRANS/WP.29/GRSG/2006/20
(Regulation No. 58)

A. COMMENTS

1. Japan acceded to Regulation No.58 in 2002. With regard to the document ECE/TRANS/WP.29/GRSG/2006/20, which proposes to double the test force for the device in Annex 5, Japan requests the experts from the European Commission (EC) and France to provide justification for the proposed test force as well as for its effect on safety. In addition, while we understand, as some relevant document indicates, that the current proposal is harmonized with Directive 2006/20/EC, which was issued prior to the submission of the proposal, we would like to know what had been discussed in the course of amending the Directive.

2. The current proposal discusses addition of structural requirements for individual elements of the underrun protection device of vehicles fitted with a platform lift at the rear. In connection with this, Japan requests the experts from the European Commission (EC) and France to provide justification, such as research paper that can be used as the grounds for strengthening regulation of the structure of platform lifts currently in production.

B. QUESTIONS REGARDING NEW PARAGRAPHS 3.2.1. AND 3.2.2. (ANNEX 5)

"3.2.1. the lateral distance between the fitting elements of the underrun device and the elements of the platform lift, which make the interruption necessary, may amount to no more than 2.5 cm."

1. Question:

The lateral distance of no more than 2.5 cm is an extremely strict requirement to Japan, because we are currently producing platform lifts with the lateral distance of no more than 10.0 cm to allow for greater freedom of the lift movement. Japan requests provision of justification, such as research paper, for requiring 2.5 cm.

"3.2.2. The individual elements of the underrun protection device must have an effective surface area, in each case, of at least 350 cm²."

2. Question:

Japan has no effective surface area requirement, and therefore requests provision of justification for the necessity of such requirement. Currently, Japan requires the height of the underrun protection device to be at least 10 cm; in order to secure an effective surface area of at least 350 cm², the underrun protection device needs to be at least 35 cm in length. It is difficult, however, to secure that length, especially at the outer underrun protection device.

Reference: Back view of individual elements of the underrun protection device

