Proposal for Supplement 2 to the 04 series of amendments to UN Regulation No. 11 (Door latches and hinges)

Submitted by the expert from the International Organization of Motor Vehicle Manufacturers *

The text reproduced below was prepared by the expert from the International Organization of Motor Vehicle Manufacturers (OICA) to amend the transitional provisions of UN Regulation No. 11 following the adoption of the new guidelines on regulatory procedures (see ECE/TRANS/WP.29/2017/107, Corr. 1 and Add.1). It is based on informal document GRSP-62-32 distributed during the sixty-second session of the Working Party on General Safety (GRSP) (ECE/TRANS/WP.29/GRSP/62, para. 52). The modifications to the existing text of the UN Regulation are marked in bold for new or strikethrough for deleted characters.

* In accordance with the programme of work of the Inland Transport Committee for 2014–2018 (ECE/TRANS/240, para. 105 and ECE/TRANS/2014/26, programme activity 02.4), the World Forum will develop, harmonize and update UN Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.
I. Proposal

Insert a new paragraph 13.10., to read:

"13.10. Contracting Parties applying this UN Regulation shall continue to accept UN type-approvals issued according to the preceding series of amendments to this UN Regulation first issued before 1 September 2016."

II. Justification

1. When developing the 04 series of amendments to UN Regulation No. 11, it had always been understood that the new requirements would only become applicable for new approvals and would not affect previously granted approvals. Consequently, no date was specified from which Contracting Parties applying UN Regulation No. 11 could refuse previously granted approvals.

2. The new regulatory procedures adopted by WP.29 at its November 2017 session, however foresee that, in the absence of "Date (c)", i.e. the so-called New Registrations date, and in the absence of any other specification in the transitional provisions, this "Date (c)" would automatically be considered as identical to "Date (b)", i.e. the so-called Type Approval date. As a result, there is now the risk that previously granted approvals could be rejected.

3. OICA is not aware of any particular issue at this stage, but nevertheless believes that the transitional provisions in UN R11 need to reflect the situation valid at the time of adopting the 04 series of amendments, namely that existing approvals should remain acceptable.