ECE-Regulation 52, driver's door as emergency door.
The Netherlands has become a Contracting Party on Regulation 52 (small capacity buses) and would like to have some clarification about the intention of one of the requirements (5.7.2.4.2) on emergency doors.

Paragraph 5.7.2.4 reads as follows:

5.7.2.4 For the driver's door to be accepted as an emergency door for the main passengers’ compartment, it shall:
5.7.2.4.1 either satisfy all requirements as to dimensions of the door aperture and accessibility, or
5.7.2.4.2 satisfy the requirements relating to the dimensions of emergency doors indicated in paragraph 5.6.3.1 (125 x 55 cm), fulfil the requirements indicated in paragraph 5.6.2.5.2., and exclude any possibility of encountering an obstacle between the driver’s seat and the driver’s door.

where 5.6.2.5.2 reads

5.6.2.5.2 the driver's door shall be accepted as an emergency door for the occupants of the seats situated beside the driver's seat provided that driver's seat, the steering wheel, the engine housing, the gear lever and the handbrake control, etc., do not constitute too great an obstruction 5/. The service door provided for the passengers shall be in the side of the vehicle opposite to that containing the driver's door and shall be accepted as the emergency door for the driver;

5/ An objective method of verifying that this requirement is satisfied may be established for the use of testing laboratories.

As we don't want to create trade barriers due to a wrong interpretation we would appreciate if GRSG could discuss this item and to give an answer on the following question:

Does paragraph 5.7.4.2.2 permit the possibility that the passengers have to cross the driver's seat in case of an emergency?

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