

VDA

Verband der
Automobilindustrie

VDA position on the proposal for draft amendments to UN-ECE R94

- A proposal to change an existing regulation must be sufficiently justified.
- The VDA (German Automobile Industry Association) does not see sufficient justification to change Regulation No. 94.
- The VDA opposes the proposal for draft amendments to Regulation No. 94 as outlined in ECE/TRANS/WP.29/GRSP/2007/17.
- The VDA is concerned that the proposed amendments do not guarantee an equivalent level of self-protection to the existing regulation.
- The VDA is skeptical of the benefit of the proposed amendments.
- The VDA recommends that all open questions with regards to the PDB test procedure are answered by EEVC.

Basis of the VDA position

- The current R94 test procedure has led to a significant improvement in self-protection.
- There is no apparent need to change the existing barrier:
 - no evidence can be seen in the accident statistics,
 - no benefit analysis has been provided in conjunction with the proposal,
 - no disbenefit can be seen with regards to compatibility.
- A proposal to change an existing test procedure must be accompanied by proof that the changes improve or at least match the existing level of occupant protection:
 - It is not sufficient to simply test vehicles that are designed to meet the current requirements.
 - It is necessary to check whether unsafe vehicle designs can also satisfy the test criteria.
- The introduction of the PDB into Regulation 94 may lead to a reduction in the energy absorption capability of new vehicles, because the PDB can dissipate a high proportion of the test kinetic energy.

Basis of the VDA position

- Bottoming out and instability of the barrier are not disadvantageous for occupant protection. Both effects ensure that the forces acting on the compartment and the energy absorption capability of the vehicle increase.
- The introduction of the PDB test procedure into Regulation No. 94 has never been discussed by EEVC.
 - EEVC has only discussed the PDB test procedure for the assessment of compatibility and has never recommended its use.
 - EEVC sees the necessity for further research with regards to the PDB test procedure and barrier.
- The proposal includes several new changes to the PDB barrier design that have not been investigated. The proposed barrier is effectively unknown and untested.
- The possible impact of the PDB test procedure on consumer rating tests should be clarified.
- The R94 barrier in its current form is the only globally harmonised barrier for offset crash tests.

Basis of the position

- The VC-Compatible project and EEVC WG15 were concluded with the following work required to complete the development of the PDB test procedure:

Quote: VC-Compatible Deliverable 29

- Confirm that PDB approach leads to stiffer lighter car and allows force matching concept

Quote: EEVC WG15 Final report to Steering Committee

- Validate that the PDB test guarantees a minimum EES test severity for all vehicles.

- No further work has been presented to answer these questions, however the proposed draft amendments include the following justification:

- Encourage lighter vehicles to be stronger without increasing the force levels of heavier vehicles
- Harmonise front end force
- Harmonise test severity for vehicles of different masses
- Reinforce passive safety performance