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Economic Commission for Europe**Inland Transport Committee****World Forum for Harmonization of Vehicle Regulations****Working Party on Passive Safety****Forty-eighth session**

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Item 8 of the provisional agenda

Regulation No. 11 (Door latches and hinges)**Proposal for Supplement 3 to the 03 series of amendments****Submitted by the International Organization of Motor Vehicle
Manufacturers ***

This proposal was prepared by the expert of the International Organization of Motor Vehicle Manufacturers (OICA) and aims at superseding ECE/TRANS/WP29/GRSP/2010/16, ECE/TRANS/WP29/GRSP/2010/17. It is based on a document without a symbol (GRSP-47-23) distributed during the forty-seventh session of the Working Party on Passive Safety (GRSP). The modifications to the current text of Regulation No. 11 are marked in bold for new or strikethrough for deleted characters.

* In accordance with the programme of work of the Inland Transport Committee for 2006–2010 (ECE/TRANS/166/Add.1, programme activity 02.4), the World Forum will develop, harmonize and update Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.

I. Proposal

Paragraph 1., amend to read:

“1. Scope

This Regulation applies to vehicles of categories M₁ and N 1/ with respect to ~~latches and door retention components such as hinges and other supporting means on~~ **their** doors, which can be used for the entry or exit of the occupants **and/or can present the risk of occupants being thrown from a vehicle as a result of impact.**”

Paragraph 2.1., amend to read:

“2.1. “Approval of a vehicle” means the approval of a vehicle type with regard to **its doors.**”

Paragraph 2.5., amend to read:

“2.5. “Back door” is a door or door system on the back end of a motor vehicle through which passengers can **gain ingress or egress (including ejection)** ~~enter or depart the vehicle,~~ or **through which** cargo can be loaded or unloaded. It does not include:

- (a) a trunk lid; or
- (b) a door or window composed entirely of glazing material and whose latches and/or hinge systems are attached directly to the glazing material.”

Paragraph 3.1., amend to read:

“3.1. The application for approval of a vehicle type with regard to **its doors** ~~latches and door retention components~~ shall be submitted by the vehicle manufacturer or by his duly accredited representative.”

Paragraph 5.1., amend to read:

“5.1. The requirements apply to all side and back doors and door components, **that are in the scope**, except for those on folding doors, roll-up doors, detachable doors, and doors that are designated to provide emergency egress.”

Paragraph 6., amend to read:

“6. Performance requirements applicable to vehicles in categories M₁ and N₁”

Paragraph 7., amend to read:”

“7. Test procedures applicable to vehicles in categories M₁ and N₁ only”

Paragraph 13.7., amend to read:

“13.7. As from **18 months from the official date of entry into force of Supplement 3 to the 03 series of amendments, Contracting Parties**

applying this Regulation shall grant approvals only if the vehicle type to be approved meets the requirements of this Regulation as amended by Supplement 3 to the 03 series of amendments.”

Annex 1, amend to read:

“...with regard to ~~the doors latches and door retention components~~ pursuant to Regulation...”

II. Justification

1. Basically, this draft amendment proposes that the unique European Union (EU) requirements on running boards, etc (i.e. Annex 7 of ECE/TRANS/WP.29/GRSP/2010/16, tabled by the expert from the European Commission) are not copied into the 1958 Agreement framework, but the EU would keep these requirements strictly within the EU framework, i.e. through a separate EU Directive or in the EU General Safety Regulation. This would ensure that UNECE Regulation No. 11 remains widely applicable in a large number of countries, in line with global technical regulation No. 1. The inclusion of the EU requirements (running boards, etc) in Regulation No. 11 have no road safety justification and could create serious difficulties for non-EU markets and the manufacturers present on these markets.

2. In addition, the proposed footnote X in ECE/TRANS/WP.29/GRSP/2010/16 is (in the opinion of the expert from OICA) contrary to the spirit of the 1958 Agreement, since it would in effect entail two different levels of stringency for the same Regulation and thereby create serious difficulties for the mutual recognition of type approvals.

3. Retaining the EU requirements in the EU framework would also enable this change to Regulation No. 11 to be a simple Supplement, thereby also greatly facilitating the drafting of transitional provisions.

4. Detailed explanations on the various paragraphs are as follows:

5. *Paragraph 1:* This actually extends the scope from M_1/N_1 to M_1/N , i.e. addition of N_2 and N_3 . As long as the unique EU requirements are dealt with in the framework of the EU and are not extended to UNECE, no significant difficulties are expected. The proposal also incorporates the Dutch proposal ECE/TRANS/WP.29/GRSP/2010/17.

6. *Paragraph 2.5:* This is copied from ECE/TRANS/WP.29/GRSP/2010/17, tabled by the expert from the Netherlands with some editorial changes.

7. *Paragraph 13.7.* Taking into account that the existing transitional provisions of Regulation No. 11 already enable Contracting Parties to refuse registration of vehicles not meeting the 03 series of amendments to Regulation No. 11 (paragraph 13.6), there is no reason why previous approvals of the 02 series of amendments would cease to be valid: this would indeed still enable individual countries to still accept previous valid approvals and to keep in use the concept the mutual recognition of approvals among those countries for which the previous level of Regulation No. 11 is perfectly satisfactory. The expert from OICA therefore proposes to delete the contents of this paragraph (solving at the same time the concerns identified by the expert from the Czech Republic in Informal document GRSP-45-14) and to insert an application date for the new Supplement 3 to the 03 series of amendments, thereby allowing a smooth introduction of this latest level for type approval.