

REGULATION No. 11

(Door latches and hinges)

Proposal for Supplement 2 to the 03 series of amendments to Regulation No. 11

This proposal is submitted by OICA and is intended to supersede ECE/TRANS/WP29/GRSP/2010/16, ECE/TRANS/WP29/GRSP/2010/17 and informal document GRSP-45-14

A. Proposal

Paragraph 1., amend to read:

"1. Scope

This Regulation applies to vehicles of categories M₁ and N₁/ 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 be ejected~~, 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** 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., replace by:

"13.7. As from 18 months from the official date of entry into force of Supplement 2 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 2 to the 03 series of amendments."

Annex 1, amend to read:

"...with regard to **the doors** pursuant to Regulation..."

B. Justification

Basically, this proposal proposes that the unique EU requirements on running boards, etc (i.e. Annex 7 of the EC proposal GRSP/2010/16) are not copied into the 58 Agreement framework, but that the European Union 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 R11 remains widely applicable in a large number of countries, in line with gtr1. The inclusion of the EU requirements (running boards, etc) in UNECE R11 have no road safety justification and could create serious difficulties for non-EU markets and the manufacturers present on these markets.

In addition, the proposed footnote X in GRSP/2010/16 is, in OICA's opinion, contrary to the spirit of the 58 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.

Retaining the EU requirements in the EU framework would also enable this change to UNECE R11 to be a simple Supplement, thereby also greatly facilitating the drafting of Transitional Provisions.

Detailed explanations on the various paragraphs are as follows:

Paragraph 1: This actually extends the scope from M1/N1 to M1/N, i.e. addition of N2 and N3. As long as the unique EU requirements are dealt with in the framework of the EU and are not extended to ECE, no significant difficulties are expected. The proposal also incorporates the Dutch proposal GRSP/2010/17,

Paragraph 2.5: This is copied from the Dutch proposal GRSP/2010/17, with however some editorial changes.

Paragraph 13.7. Taking into account that the existing transitional provisions of UNECE R11 already enable Contracting Parties to refuse registration of vehicles not meeting UNECE R11.03 (paragraph 13.6), there is no reason why previous approvals (R11.02) 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 R11 is perfectly satisfactory. OICA therefore proposes to delete the contents of this paragraph (solving at the same time the concerns identified by the Czech Republic in informal document GRSP-45-14) and to insert an application date for the new Supplement 2 to R11.03, thereby allowing a smooth introduction of this latest level for type approval.
