

**UN Regulation No. 58 – Rear Underrun Protection Devices (RUPD) -
CLCCR observations and recommendations on the German document
ECE/TRANS/WP.29/GRSG/2013/27**

Note: The text reproduced below was prepared by the CLCCR to share with GRSG crucial observations concerning the proposal to sharpening the requirements of rear underrun protection devices. We also give some proposal how to continue the processing of the proposal.

I. BACKGROUND

The German proposal has been up for discussion at preceding sessions of the GRSG and there have also been some consultation meeting arranged by the BMVBS. A cost benefit analysis has been made by the BaST.

II. CLCCR OBSERVATIONS

The subject of the proposal is of course very important and shall be handled accordingly. Hence the CLCCR is cautious that resources put in to the task to decrease fatalities and severe injuries are well spent. From this perspective the first observation is that the cost-benefit analysis has apparently not given any reason for change. We find that strange as the analysis show large differences in the cost-benefit. This would have by reasonable judgement resulted in a differentiation of the requirements. O4 in particular but also O3 category is prone to benefit from changes while N3 category is not motivated.

Some dimensioning changes in the installation may be well founded but to be effective with the same level of implementation across contracting parties the exemption handling need to be more precise. As an example references in this context is made to off-road vehicles according to definitions in 678/2011/EU. There are many vehicles commonly used on constructions sites that do not qualify as Off-road vehicles according the 2007/46/EU. Nevertheless the RUPS according to UNECE R58 are incompatible with the use.

The Japanese delegation has also illustrated a number of applications that will not be compatible. The current German proposal does not give any guidance how to manage those vehicles in a consistent way to achieve the best traffic safety.

The German proposal touches upon the specification of the test set-up. An attempt is made to get a more realistic test procedure. Unfortunately the proposals for change do bring more uncertainty in to the test results than they take out. It is a good idea to bring truck side rail members into the set-up. However nothing is said about the stiffness of that side rail arrangement. Furthermore there is nothing said about the fixation of the loading actuator. There are a number of details missing in the description. Accordingly depending on what technical service use the interpretation may differ. As a result the performance of the RUPS tested can vary substantially.

The regulation as is requires that the deformation of the RUP beam is accounted for. However when pointing at what deformation to use, reference is made to §7.3 of part I of the regulation. The problem with this is that there are two deformations (during and after load) stated in §7.3. I.e. depending on which of the measured deformations you choose the installation will end up in different positions.

There has still, 2013 October 03, not been a justification document published by the BMVBS as promised in the working document. We consider this to be an indication that the proposal is not yet mature to be decided up on.

III. CLCCR RECOMMENDATIONS

Referring to the observation given above the CLCCR concludes that there are a number of concerns with the current regulation as well as with the German proposal that needs to be sorted out.

Accordingly the CLCCR proposes that an informal working group is set up to elaborate a revision of the regulation 58.

IV. JUSTIFICATION

The current German proposal is the result of internal processing in the BMVBS. There has been two hearings and a cost benefit analysis made. Neither of those has been accounted for in the proposal. The CLCCR finds this process of iteration over GRSG to be too inefficient and without important input from all stakeholders.

An informal working group would be much more transparent and result in a better regulation.

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