

**Proposal for amendments to TRANS/WP.29/GRSP/2005/13**  
(Clarification of the scopes of the Regulations)

**A.1. PROPOSAL**

Regulation No. 16 – Safety belts

Paragraph 1., amend to read:

"1. SCOPE

1.1. This Regulation applies to:

- **approval of safety-belts and restraint systems designated for installation in vehicles of category N, M, L<sub>2</sub>, L<sub>4</sub>, L<sub>5</sub>, L<sub>6</sub>, L<sub>7</sub> and T;**
- **approval of vehicles of categories M and N with regard to the installation of safety-belts and restraint systems;**
- **approval of vehicles of category M<sub>1</sub> and N<sub>1</sub> with regard to the installation of child restraint systems and ISOFIX child restraint systems."**

**B.1. JUSTIFICATION**

Regulation No. 16 covers approval of safety-belts as a component and restraints system. The Regulation also covers approval of vehicles of categories M and N with regard to the installation of safety-belts and restraint system. In addition to that the Regulation covers approval of vehicles of categories M<sub>1</sub> and N<sub>1</sub> with regard to the installation of child restraint systems and ISOFIX child restraint systems.

**A.2. PROPOSAL**

Regulation 17 – Strength of seats

Paragraph 1., amend to read:

"1. SCOPE

1.1. This Regulation applies to **approval of vehicles of category N, M<sub>1</sub>, M<sub>2</sub> Class A, M<sub>3</sub> Class I or A** with regard to the strength of seats, their anchorages, and their head restraints with the exception of folding, side-facing or rearward-facing seats and head restraints fitted to these seats. **At the request of the manufacturer vehicles of category M<sub>2</sub> Class B may be approved according to paragraph 5.1. in this Regulation.**

1.2. It also applies to **vehicles of category M<sub>1</sub> with regard to the strength of their seatbacks and with regard to devices intended to protect the occupants from the danger resulting from the displacement of luggage in a frontal impact."**

## **B.2. JUSTIFICATION**

In the EU, there is one single document (directive 74/408/EEC as amended) which covers seats and installation of seats in vehicles and head restraints of categories M<sub>1</sub>, M<sub>2</sub>, M<sub>3</sub>, N<sub>1</sub>, N<sub>2</sub> and N<sub>3</sub>.

The technical requirements for seats and installation of seats are for

- category M<sub>1</sub> contained in annex II,
- category M<sub>2</sub> Class B and M<sub>3</sub> Class II, III and B contained in annex III,
- category N<sub>1</sub>, N<sub>2</sub> and N<sub>3</sub> contained in annex IV, and
- category M<sub>2</sub> class A and M<sub>3</sub> Class I or A contained in annex IV. Buses Class I and A are design for standing passenger.

In the ECE, there are two documents Regulation No. 17 and Regulation No. 80 which together covers seats and installation of seats and head restraints in vehicles of category M<sub>1</sub>, M<sub>2</sub>, M<sub>3</sub>, N<sub>1</sub>, N<sub>2</sub> and N<sub>3</sub>.

Regulation No. 80 covers forward facing seats, seats anchorages and installation of seats in vehicles in category M<sub>2</sub> Class B and M<sub>3</sub> Class II, III and B (seating passenger). The Regulation was developed at a time when belted occupancy was unusual in buses and is based on a seat design to collapse in a controlled manner to absorb the impact of a passenger behind. For that reason our interpretation are that Regulation No. 80 is limited to the passenger seats. Furthermore the test procedure is not suitably for a driver's seat with suspension.

Regulation No. 17 covers forward facing seats, seats anchorages and installation of seats in vehicles of category M<sub>1</sub>, M<sub>2</sub> Class A, M<sub>3</sub> Class I or A, N<sub>1</sub>, N<sub>2</sub>, N<sub>3</sub> and the driver's seat in all buses. The Regulation also covers requirements for head restraints for vehicle of category M<sub>1</sub>, M<sub>2</sub> with a maximum mass not exceeding 3500 kg and of category N<sub>1</sub>. The technical requirements for seats and installation of seats are for:

- M<sub>1</sub> contained in paragraph 5.1,
- N<sub>1</sub>, N<sub>2</sub> and N<sub>3</sub> and M<sub>2</sub> Class A and M<sub>3</sub> Class I, and A contained in paragraph 5.2. The requirements for the driver's seat in all buses are also included in this paragraph.

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