

Proposal for changes to document GRSG/2020/20

UN Regulation No. 107 (General construction M₂ & M₃)

Submitted by the experts of OICA

The text reproduced below was prepared by the experts from OICA. This proposal amends the working document referenced ECE/TRANS/WP.29/GRSG/2020/20. The modifications to the current proposal ECE/TRANS/WP.29/GRSG/2020/20 are marked in red characters.

I. Proposal

Annex 8

Paragraph 3.11.3.1.1., amend to read:

"3.11.3.1.1. Lifts shall only be capable of operation when the vehicle is at standstill. **The vehicle shall have a starting prevention device that remains active until the lift is in its stowed position. If the lift gives access to the vehicle through a door referred to in paragraph 3.6 of this Annex that is not a service or emergency door, the starting prevention device shall remain active until the door is fully closed.** Any movement of the platform shall be prevented unless a device preventing the wheelchair from rolling off has been activated

II. Justification

1. OICA generally supports the improvement in safety provided by the proposal from Spain.
2. The text proposed for the amendments to paragraph 3.11.3.1.1. however brings some ambiguity as to which door is addressed.
3. OICA believes that referring to the paragraph 3.6. of Annex 8 clarifies that the doors addressed by the Spanish proposal are those having wheelchair accommodations since the lift is primarily dedicated to the passage of persons in wheelchairs.