

Distr.: General  
28 April 2021

Original: English

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**Economic Commission for Europe**

Inland Transport Committee

**Global Forum for Road Traffic Safety**

Informal session  
Geneva, 5 May 2021

**HF-IRADS comments on the Other Activities  
draft text IGEAD meeting 20 April 2021**

**Submitted by Human Factors in International Regulations for  
Automated Driving Systems (HF- IRADS)**

These comments are framed around the “clean” version of the draft text circulated on behalf of the IGEAD Chair in advance of the IGEAD meeting on 20 April 2020. For the sake of clarity, the relevant text from the Chair’s version is provided.

**Paragraph 12(b)**

(b) Automated driving system is responsible for the safe execution of dynamic control, when the automated driving system is performing the driving task: (WP.1 Chair: pls clarify)

We propose to change this to: “The automated driving system is responsible for the safe execution of the dynamic driving task (DDT), when the automated driving system is performing the DDT”.

**Paragraph 23**

23. The manufacturer of the automated driving system should provide the driver with clear explanations about the prescribed use of the vehicle system before the driver uses it, and consequently the driver must be aware of these explanations before using the system. This should include the implications for the driver’s responsibilities and their expected behaviour in the case of a transition demand, according to applicable international and national law. In addition, the manufacturer should not use misleading names, descriptions and promotional material which could encourage improper use of the system.

We propose to delete “and consequently the driver must be aware of these explanations before using the system” since there is no way to verify such awareness and the clause creates the potential to blame the user.

**Paragraph 28**

28. Drivers should consider their individual capabilities to resume driving when deciding whether to engage in activities other than driving when the automated driving system is engaged. A driver should not engage in an activity other than driving if the activity itself, the driver's individual circumstances, or other conditions could prevent the driver from safely responding to a transition demand in a timely manner.

We support the proposal from Sweden to delete this paragraph which would require drivers to consider their capabilities. This is a paragraph that we have previously identified as being problematic, since the research evidence is that drivers are not capable of reliably assessing their capabilities.

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