

### **Comments from OICA to the updated proposal of the Russian Federation for an amendment to UN Regulation No. 66 (GRSG/2021/23)**

The text reproduced below reflects the comments from OICA to the updated proposal of the Russian Federation for an amendment to UN Regulation No. 66 (GRSG/2021/23).

OICA welcomes Russia's attempt to modify UN R66 to increase safety of passengers in buses and coaches in the case they are involved in a roll-over accident. Unfortunately, the proposed amendments would lead to leave the path of harmonisation and would focus on the full-scale vehicle test, which is only one option for the approval of buses and coaches according to UN R66.

In detail:

1. Paragraph 5.3.5. in document GRSG/2021/23 is proposed to read:

***"5.3.5. however, if the approval was granted without assessing the operability of the emergency hatches and injury-safety in the passenger compartment, as provided for in Appendix 1 to Annex 5, then a Contracting Party may require verification of compliance with the requirements of Appendix 1 to Annex 5 at the national level."***

This proposed new paragraph 5.3.5. seems contradictory to the 58 Agreement and its principle of mutual recognition because of adding provisions based on domestic regulations. The proposal is not similar to that of UN R144 (AECS) since the latter contains the wording in its scope, and with a different meaning:

*"1.4. Global Navigation Satellite System (GNSS) position determination may be approved at the request of the applicant.*

*However, if the applicant opts to request approval of a AECD/AECS or AECC without the GNSS positioning as described in this Regulation, national requirements of the Contracting Parties apply."*

The difference lies in that UN R144, in the definition of the scope, makes GNSS approval optional to the manufacturer, who can then decide to omit that part for territories applying national corresponding requirements.

The RUS proposal per document GRSG/2021/23 actually specifies the roll-over test such that a contracting party can unilaterally decide that their national requirements apply, thereby fragmenting the application of the regulation.

OICA urges GRSG to keep the text of the regulation aligned to that of the 58 Agreement.

2. OICA is keen that the new requirements of the proposed new Appendix 1 to Annex 5 are such that they can be applied to all possible approval methods (full scale, test of the body section, simulation, etc.). In this regard, OICA suggests shifting the requirements for hatch assessment in the body of the text, e.g. as a new paragraph 5.1.3. and relevant adaptation of annexes 6 to 9. This should be further discussed in a dedicated task-force.

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3. About Annex 5, paragraph 1.2., OICA requests clarification of the requirements and results expected by the RUS proposal. For example, “seat mounts” should be defined. OICA suggests that a task-force defines component tests with accurate pass/fail criteria together with measuring methods and test protocols.
  4. About Annex 5, Paragraphs 2.1. and 2.2.5 and Annex 5, appendix 1, paragraph 1.3, OICA points out that the removable elements (furniture, fire extinguishers, etc.) are not required to be fitted to the vehicle at the time of Type Approval. OICA questions whether UN R66 is the right place to cover this.
  5. According to the definition of “amendments to the regulations” in the 58 Agreement, such significant modifications that lead to an increase in the stringency of the requirements should be introduced via a new series of amendments, with proper transitional provisions.
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