

Comments on the proposal of the Russian Federation to amend Regulation No. 66

The text reproduced below reflects the comments from Italy to the updated proposal of the Russian Federation for an amendment to UN Regulation No. 66 (ECE/TRANS/WP.29/GRSG/2021/23).

Comment to Paragraph 5.3.5. of document ECE/TRANS/ WP.29/GRSG/2021/23:

"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."

The requirements linked to emergency hatches are applicable only in case of physical roll over test. In case of simulated roll over test it is impossible to apply the prescription.

Comment to Annex 5, Appendix 1, paragraph 1.2. (seat mounts – anchorages): these prescriptions are in the perimeter of UN Regulation No 80 or UN Regulation No 17, that well prevent the issue of detachment. Furthermore, the UN Regulation 80 was recently amended with the series 04 in order to make mandatory the dynamic test for those seats that do not have mechanical fixation.

Below is the text which is currently in Regulation No. 80, para. 5.5:

"5.5 Static test in Appendix 5 is not permitted if the seat is attached to the vehicle structure by means of any clamping without mechanical fixation. Mechanical fixation means a positive locking of the seat that prevents the seat from moving in the driving direction "

Therefore, the text proposed by Russian Federation is not needed since an amendment to Regulation No. 80 would be more appropriate.

Comment to Annex 5, Paragraphs 2.1. and 2.2.5 and Annex 5, appendix 1, paragraph 1.3,

At present in the UN Regulation no 107, the removable elements (furniture, fire extinguishers, etc.) are not required to be fitted to the vehicle. It is only required to define the space available for this objects. We see the need to further discuss out to handle removable elements in UN Regulation No.107. Specific prescriptions should be assessed not only for the roll-over test but for all type of crash. We can find a good example in the UN Regulation No. 110 addressing the way CNG tanks are restrained, by means of simulation .
