

Request for guidance regarding drafting the amendments to UN Regulation No. 66 (strength of superstructure – buses)

I. Background

1. In connection with the accidents that occurred on the territory of the Russian Federation with the participation of buses, in which a large number of people (passengers) were injured, state surveillance was carried out in the Russian Federation with regard to such buses (vehicles of categories M2 and M3) released into circulation on the market. The results of these activities were presented at the WP.29 179th session (document WP.29-179-Rev.1).

2. State surveillance included, amongst other items, rollover tests performed on complete buses in accordance with the provisions of Annex 5 to UN Regulation No. 66 to assess the integrity of the residual space that shall be kept in the passenger compartment.

3. During the tests, it was found, in particular, that increasing the risks of passengers' injury factors are penetration into the residual living space of individual structural elements that were torn off or deformed under the influence of changes in the geometry of the body or were poorly secured (luggage racks, hammers for emergency glass breaking, fire extinguishers), as well as the detachment of passenger seats. In addition, according to the test results, it was revealed that the opening of emergency exits, in particular, located on the roof of the bus, was not always possible.

4. In connection with the results of the described state surveillance, the Russian Federation initiated development of the amendments to UN Regulation No. 66 and submitted to GRSG the relevant proposals, the essence of which was to introduce additional checks during the rollover test of a complete bus. These checks should cover the possibility of evacuation of passengers through the emergency hatch in the roof, the integrity of the seat fastenings, the absence of movement of traumatic objects during the test. Such checks require providing a fully equipped and serviceable vehicle for testing.

5. UN Regulation No. 66 provides for the possibility of using a number of compliance assessment methods that are considered to be equivalent: (1) rollover of a complete vehicle; (2) rollover of representative body sections; (3) quasi-static tests of body sections under load; (4) quasi-static calculations based on the results of component tests; (5) computer simulation of a complete vehicle rollover test based on dynamic calculations. However, the proposed by the Russian Federation additional checks are possible only when rolling over a complete vehicle.

II. Description of the concern

6. When submitting its proposals for amendments to UN Regulation No. 66, the Russian Federation did not consider them to be mandatory and proposed them as optional, since the conduct of additional checks proposed by the Russian Federation violates the principle of equivalence of the compliance assessment methods established in UN Regulation No. 66. At the same time, it does not seem feasible, within the framework of calculation methods or tests of incomplete body sections, to obtain results comparable to the results of tests of a complete vehicle in terms of such checks. However, the Russian Federation considers such checks to be necessary.

7. Fulfilling the obligations under the 1958 Geneva Agreement, the Contracting Parties thereto shall accept type approvals pursuant to UN Regulation No. 66 provided on the basis of compliance assessment results obtained per any of the methods described in UN Regulation No. 66. Being interested in carrying out the said additional checks, the Russian Federation proposed that these checks be carried out at the discretion of the Contracting Party. However, GRSG experts see this as a violation of the provisions of Article 3 of the 1958 Geneva Agreement as below:

«Wheeled vehicles, equipment or parts for which type approvals have been issued by a Contracting Party in accordance with Article 2 of this Agreement, shall be held to be in conformity with the relevant part of the national legislation of all the Contracting Parties applying the said UN Regulation»;

«Contracting Parties applying UN Regulations shall, by mutual recognition, accept for the placement in their markets ... type approvals granted pursuant to these UN Regulations, without requiring any further testing, documentation, certification or marking concerning these type approvals».

III. Request for the WP.29 guidance

8. The Russian Federation considers that the proposed additional checks of a complete vehicle during rollover tests should be provided within the framework of UN Regulation No. 66 in the case, when a Contracting Party requires such checks. Such a flexible approach allows other Contracting Parties not to require these additional checks if they do not consider them necessary. With this approach, the relevant provisions can be included in UN Regulation No. 66 as optional, with the establishment of their mandatory implementation at the discretion of the Contracting Party.

9. The Russian Federation requests WP.29 to confirm the possibility of such an approach to the establishment of additional provisions in UN Regulation No. 66 and provide guidance to GRSG on how the proposed provisions can be introduced into UN Regulation No. 66.