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Proposal to amend document GRSG-126-02 to allow vehicles up to 8t/12t to utilise approvals to UN R.160 as being equivalent. The changes compared to the document GRSG-126-02 are marked in bold characters.

## I. Proposal

"1.1. This Regulation applies to the approval of vehicles of categories M<sub>2</sub>, M<sub>3</sub>, N<sub>2</sub> and N<sub>3</sub>.<sup>\*</sup> with regard to their Event Data Recorders (EDRs).

*Paragraph 1.2. to 1.3., deleted*

*Paragraph 4.1., amend to read:*

"4.1. If the vehicle type submitted for approval pursuant to this Regulation meets the requirements of paragraph 5. below approval of that vehicle type shall be granted.

Alternatively, approval shall be granted, at the request of the manufacturer and in case of a vehicle type equipped with deployable restraint system with GVW up to 12t,

- if this vehicle type meets the technical requirements of paragraph 5.1 to 5.5 and the transitional provisions of the 01 or later series of amendments to UN Regulation No. 160; **or**
- if, for a vehicle type with GVW between 8-12t, the manufacturer demonstrates, **by documentation per paragraph 5.6. [or any other means]**, to the satisfaction of the approval authority, that the triggering performance is equally effective to this Regulation.

[4.1.1 Vehicles referred to in paragraph 4.1. which are not subject to national and regional regulations providing for crash tests requirements referred to in paragraphs 5.4.1 and 5.4.2. of UN Regulation No. 160 shall be subject to paragraph 5.4. of this regulation.]"

*Insert new paragraph 5.6., to read:*

"**5.6. Demonstration by documentation [for a vehicle type with GVW between 8-12t and equipped with deployable restraint system]**

**5.6.1. The manufacturer shall provide a statement which affirms that the strategy chosen to trigger an EDR record ensures triggering also in accident configurations dissimilar from and/or of a lower severity than the collisions of a severity level as defined in paragraph 5.4.**

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<sup>\*</sup> As defined in Section 2 of the Consolidated Resolution on the Construction of Vehicles (R.E.3) (document ECE/TRANS/WP.29/78/Rev.7) –<https://unece.org/transport/standards/transport/vehicle-regulations-wp29/resolutions>.

- 5.6.2. The manufacturer shall choose the collision typology and severity and will demonstrate that it is significantly different than the full-scale crash tests (e.g. the ratio between the weight of the vehicle subject to approval and the impacted vehicle weight is above 2).
- 5.6.3. The manufacturer shall provide the type-approval authority with an explanation and technical documentation which shows, in overall terms, how this is achieved.
  - 5.6.3.1. Documentation that shows, to the satisfaction of the type-approval authority, that the activation of supplemental restraint systems and the severity level, chosen at the discretion of the manufacturer, also induces an EDR trigger shall be considered satisfactory.
  - 5.6.3.2. Documentation that shows, to the satisfaction of the type-approval authority, the strategy to trigger an EDR record in case of impacts of a severity level that is not considered a severe accident for the vehicle subject to approval .
  - 5.6.3.3. The extended documentation package shall remain strictly confidential. It may be kept by the approval authority, or, at the discretion of the approval authority, may be retained by the manufacturer. In case the manufacturer retains the documentation package, that package shall be identified and dated by the approval authority once reviewed and approved. It shall be made available for inspection by the approval authority at the time of approval or at any time during the validity of the approval."

## II. Justification

The changes in the justification compared to document GRSG-126-30 (UK) are marked in bold characters.

Although the desired effect is to allow vehicles up to 8t/12t to utilise approvals to UN R.160 as being equivalent, this is not a like for like recognition, therefore, utilising the scope is not an appropriate means to achieve this. This is because there are conditions based on the vehicle having a supplemental restraint system and the fact that the survivability requirements of the HD EDR regulation may still apply. Having a UN R.160 approval does not clearly indicate if this is the case and would require national or regional authorities to write such provisions into their own legislation.

**As paragraph 4 gives the administrative pass/fail criteria to grant an approval, it appears to be the proper paragraph to address the case of vehicles complying with UN R160 and fulfilling other criteria.**

Adding provisions into paragraph 5 allows for the conditions in utilising this alternative to be adequately detailed. **The proposal here aims at providing guidance to the technical services and the approval authorities to detect whether the vehicle type is compliant. The proposed wording is taken from Annex V of the EU regulation on eCall (COMMISSION DELEGATED REGULATION (EU) 2017/79).**

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