

Comments from OICA to the updated proposal of the Russian Federation for an amendment to UN Regulation No. 66

(GRSG/2024/39)

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/2024/39).

OICA appreciates Russia's intention to improve safety of passengers in buses and coaches in the case they are involved in a roll-over accident, and that Russia for that reason proposes to amend UN-R66 on strength of superstructure.

OICA however is questioning the necessity of the proposed amendments as these cannot be covered under the existing UN Regulation 66 for vehicle type approval as the proposal would lead to only full-scale vehicle tests, which is only one of multiple options for the approval of buses and coaches according to UN R66.

In detail:

We take note that Russia has addressed the criticism of their previous proposals GRSG/2021/23 being not in line with the principles of the 58 Agreement, caused by allowing contracting parties at their discretion conducting full-scale vehicle tests with assessment of the proposed incremental criteria.

OICA's understanding of the latest proposal GRSG/2024/39 is that Russia intends to make these criteria compulsory without Contracting Party nor Applicant option.

As already stated in OICA's previous response GRSG-122-02, OICA is keen that the new requirements introduced via paragraphs 5.1.3. to 5.1.5. are such that they can be applied to all possible approval methods (full scale, test of the body section, simulation, etc.) as described in Annexes 5 to 9.

In OICA's view the assessment of the incremental criteria would always necessitate full-scale physical tests, as criteria like opening forces cannot reliably be assessed by computer simulation i.e. via dynamic calculation. We see that Russia understands this as well, and therefore amended paragraph 5.4.5. as follows:

"...If the equivalent approval test method chosen by the manufacturer does not allow assessing compliance with the requirements of paragraph 5.1. of this Regulation, then the Contracting Party applying this Regulation may require the submission of the test results of the complete vehicle pursuant to Annex 5."

The obligation to perform physical tests will significantly increase the cost of homologations.

Further remarks, partially already stated in our previous comments:

1. About paragraph 5.1.5, 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. We remind that UN Regulation 66 has the focus on maintaining the residual space for passengers.

2. In line with and in full support of Italy's comments (see GRSG-122-31), in OICA's view seat attachment strength is sufficiently covered by UN Regulation 80. This Regulation is addressing the identical scope of vehicles, namely buses of categories M2 and M3, Classes II and III and Class B.
 3. Annex 5, Paragraph 2.1.5. of the current text defines two methods on how to reflect the occupant mass during testing. Both methods, either the rigid fixation of 50 % of the passenger mass or the use of an anthropomorphic ballast restrained with a 2-point belt allowing its movement during testing, were added to be able to take into account the influence of belted passengers. The proposal in document GRSG/2024/39 removes the 1st method, justified by "[the anthropomorphic ballast] is as close as possible to the real-world values". the document however lacks scientific justifications backing this statement.
 4. If GRSG sees the need to further modify UN Regulation 66 and to add such significant modifications that lead to an increase in the stringency of the requirements, they should be introduced via a new series of amendments, with proper transitional provisions.
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