

**Economic and Social Council**Distr.: General  
10 July 2015

Original: English

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**Economic Commission for Europe****Inland Transport Committee****World Forum for Harmonization of Vehicle Regulations****Working Party on General Safety Provisions****109<sup>th</sup> session**

Geneva, 29 September – 2 October 2015

Item 3 of the provisional agenda

**Regulation No. 34 (Prevention of fire risks)****Proposal for amendments to Regulation No. 34 (Prevention of fire risks)****Submitted by the expert from India<sup>\*</sup>**

The text reproduced below was prepared by the expert from India proposing to harmonize the scope of UN Regulation No. 34 and to amend the total permissible mass limit to read "2.5 tonnes" instead of "2.8 tonnes". It is based on informal document GRSG-108-41, distributed during the 108<sup>th</sup> session of the Working Party on General Safety Provisions (GRSG) (see report ECE/TRANS/WP.29/GRSG/87, para. 65). The modifications to the current text of UN Regulation No. 34 are marked in bold for new characters or strikethrough for deleted characters.

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\* In accordance with the programme of work of the Inland Transport Committee for 2012–2016 (ECE/TRANS/224, para. 94 and ECE/TRANS/2012/12, programme activity 02.4), the World Forum will develop, harmonize and update Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.

## I. Proposal

*Paragraph 1.2., amend to read:*

"1.2. Part II-1: At the request of the manufacturer, to the approval of vehicles of categories M, N and O approved to Part I or IV of this Regulation fitted with liquid fuel tank(s) with regard to the prevention of fire risks in the event of a frontal and/or lateral collision as well as to the approval of vehicles of categories M<sub>1</sub> and N<sub>1</sub>, which are of a total permissible mass exceeding ~~2.8~~ **2.5** tonnes, and categories M<sub>2</sub>, M<sub>3</sub>, N<sub>2</sub>, N<sub>3</sub> and O, fitted with tank(s) for liquid fuel, which have been approved to Part I or IV of this Regulation with regard to the prevention of fire risks in the event of a rear collision.

Part II-2: To the approval of vehicles of categories M<sub>1</sub> and N<sub>1</sub>, which are of a total permissible mass not exceeding ~~2.8~~ **2.5** tonnes, fitted with liquid fuel tank(s) approved to Part I or IV of this Regulation with regard to the prevention of fire risks in the event of a rear collision."

## II. Justification

1. The current text of UN Regulation No. 34 specifies in Part II-2, that:
  - (i) the rear impact be mandatory for M<sub>1</sub>, N<sub>1</sub> category vehicles, and
  - (ii) the applicability is for M<sub>1</sub>, N<sub>1</sub> vehicles with Gross Vehicle Mass < 2.8 t.
2. In the European Union (EU) and Indian crash regulations, wherever the applicability is based on Gross Vehicle Mass for M<sub>1</sub> and N<sub>1</sub>, the threshold value used uniformly is 2.5 tonnes. The regulations concerned are listed below:

No.	Particular	EU Regulations	Indian Standard
1	Offset Frontal Impact	UN Regulation No. 94	AIS 098
2	Pedestrian Impact	EU 78/2009, UN Regulation No. 127	AIS 100
3	Steering Impact	-	AIS 096

3. The 2.8 tonnes threshold for applicability as proposed for the rear impact proposal in UN Regulation No. 34 will create non-uniformity with the EU crash legislation and model compliance. This will lead to non-coherent product development for crash compliance for vehicles of categories M<sub>1</sub> and N<sub>1</sub>, particularly for models between a Gross Vehicle Mass of 2.5 tonnes and 2.8 tonnes.

4. Hence, to align and maintain uniformity with other EU and Indian crash regulations for M<sub>1</sub>, N<sub>1</sub> category vehicles, India proposes that UN Regulation No. 34 should be applicable to M<sub>1</sub> and N<sub>1</sub> vehicles below 2.5 tonnes instead of 2.8 tonnes.