

**UN/ECE REGULATION 17 – PROTECTION OF OCCUPANTS
AGAINST LUGGAGE DISPLACEMENT**

OICA comments to document GRSP-35-2 (Consumers International)

I. GENERAL

Following discussions at GRSP-34 (December 2003) on the basis of document GRSP-34-1, Consumers International has now submitted a new document on this same issue of dramatically amending the requirements and test procedures contained in UN/ECE R17.07 series of amendments.

Consumers International however fails to adequately respond to the GRSP-34 request as reflected in paragraph 19 of the minutes: *“Several experts requested accident statistics to justify the amendment of Regulation No. 17. When this data is presented to the GRSP, the consideration of this item may be resumed.”*

Moreover, Consumers International again fails to properly justify its proposals to review the current requirements which are the basis of very long and intensive study at GRSP in the past.

II. DATA PRESENTED BY CONSUMERS INTERNATIONAL

In its paper GRSP-35-2, CI refers to a TRL study presented at the occasion of the 17th ESV Conference of 2001 in Amsterdam.

OICA has reviewed this paper which contains a very limited number of real world accident data (5 cases are quoted) whereby restrained children sustained injuries attributed to loading through a distorted seat back.

Noteworthy is the fact that the TRL study refers to the period 1985-1995, which means that the most recent cars involved would, today, be 9 years old! In addition, taking into account the necessary development time, this also means that the above “most recent cars” are likely to have been developed at least 10-15 years ago!

This data is therefore not relevant as it predates the latest requirements of R17.07 which only became applicable in 2000 for new approvals and 2002 for new registrations.

Moreover, TRL failed to record the mass of any objects in the luggage compartment.

The inescapable conclusion therefore is that the TRL data quoted by CI in no way can be used to justify the CI demands.

III. DATA PRESENTED DURING THE DEVELOPMENT OF R17.07

The current requirements of R17.07 are the result of a strong lobbying action by CI in the nineties. The only known data used when developing these requirements are as follows:

1) Germany – Informal document 2 to GRSP-24 (December 98)

This document presented by Germany in 1998 summarised a study of a total of 5523 vehicles involved in an accident between 1993 and 1997. The main conclusions of this study were summarised as follows:

- a) A total of 5 vehicles could be selected in which occupants were injured by unsecured objects or pieces of luggage, representing 0.1% of all involved vehicles.
- b) Except for 1 particularly severe accident which resulted in an AIS 3, all other injuries were minor – AIS 1 (corresponding to bruising, abrasion, etc.) or AIS 2 (1 case only).

2) OICA – Informal document 12 to GRSP-23 (May 98)

At the 23rd GRSP session, OICA presented data collected on the basis of the European Accident Causation Study, reviewing 1784 passenger cars involved in accidents in 4 countries (France, Germany, Italy, Finland).

These data indicated that in 74% of the 1784 cars, the luggage compartment was empty. Low luggage load (< 11 kg) was found in 10%. Medium (11 to 30 kg) and high (> 30 kg) luggage load each represented 8% of all cases.

This clearly shows that the current luggage load used in R17.07 (2x18 kg = 36 kg) more than adequately represents the very vast majority of cases.

During the following GRSP-23 debate, it was agreed that OICA, Germany and Italy would search for accident data showing directly injuries caused by luggage in vehicles (see TRANS/WP29/GRSP/23, paragraph 6). While Germany was able to present limited data at GRSP-24 (see item 1 above), no other data could be produced at that time on child injuries caused by luggage.

IV. OTHER ISSUES

OICA also strongly objects to the tests conducted on behalf of Consumers International, as presented in informal document GRSP-34-1.

Among other things, it should be noted that repeat tests were conducted on the same body shells:

- EuroNCAP front impact
- R17 test
- CI test

It is obvious that these repeated tests weaken the whole structure even if no structural damage is readily apparent to the naked eye.

Therefore, the tests conducted by ANEC for Consumers International cannot be considered as representative of the real world and lack all scientific basis.

V. CONCLUSION

OICA concludes from the above considerations that none of the data presented to GRSP till now justifies resumption of activities to amend UN/ECE Regulation 17 towards new requirements addressing occupant protection against luggage load.

OICA also believes that the current workload of GRSP is already very heavy and that attention should not be diverted towards irrelevant issues.

Any renewed consideration of the current UN/ECE R17 requirements which, as already stated, are very recent and are just in the process of being implemented, need to be fully justified, which is currently not the case.
