

Transmitted by the expert from the Netherlands

PROPOSAL FOR AMENDMENTS TO REGULATION No.11  
(Door latches and hinges)

Note: The text reproduced below was prepared by the expert from the Netherlands in order to solve interpretation difficulties that were raised by several contracting parties.

A. PROPOSAL

1. SCOPE

This Regulation applies to vehicles of categories M<sub>1</sub> and N<sub>1</sub> 1/ with respect to latches and door retention components such as hinges and other supporting means on doors, which can be used for the entry or exit of the occupants **and/or can present the risk of occupants being thrown from a vehicle as a result of impact.**

2.5. "Back door" is a door or door system on the back end of a motor vehicle through which passengers can enter or depart ~~the vehicle~~ **or be ejected**, or cargo can be loaded or unloaded. It does not include:

(a) a trunk lid; or

(b) a door or window composed entirely of glazing material and whose latches and/or hinge systems are attached directly to the glazing material.

5.1. The requirements apply to all side and back doors and door components, **that are in the scope**, except for those on folding doors, roll-up doors, detachable doors, and doors that are designated to provide emergency egress."

B. JUSTIFICATION

According to the scope only doors which can be used for the entry or exit of the occupant are covered, however paragraph 5.1. asks for an application of the requirements to all doors.

This was felt to be a contradiction, specifically where it concerns back doors of hatchback vehicles. This item has been brought up in a so called TAAM meeting (Type Approval Authorities Meeting of EU member states). The outcome of this meeting is clearly that such back doors should not be excluded from fulfilling the requirements and The Netherlands was requested to prepare a clarification for UNECE Reg.11.

It is hereby proposed to sharpen the existing text in the involved paragraphs, being:

1. SCOPE and 2.5. Back doors (its definition) and in paragraph 5.1. (about the application of requirements).

The clarified text now clearly speaks of also "ejection" with the intention to solve the interpretation problems of the past.

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