



Transmitted by the expert from Poland

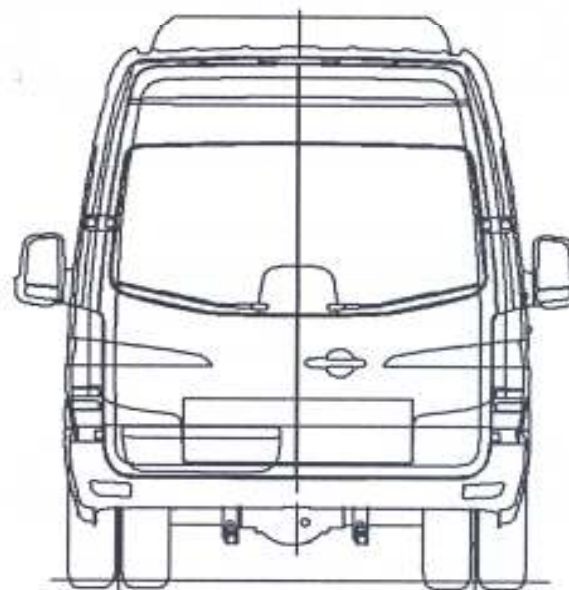
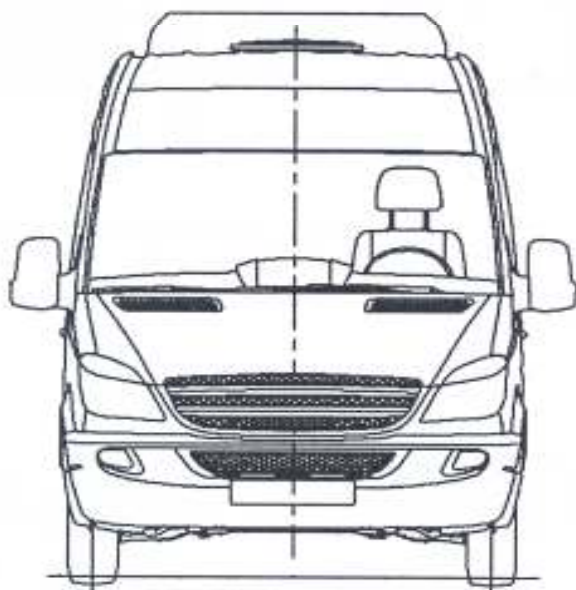
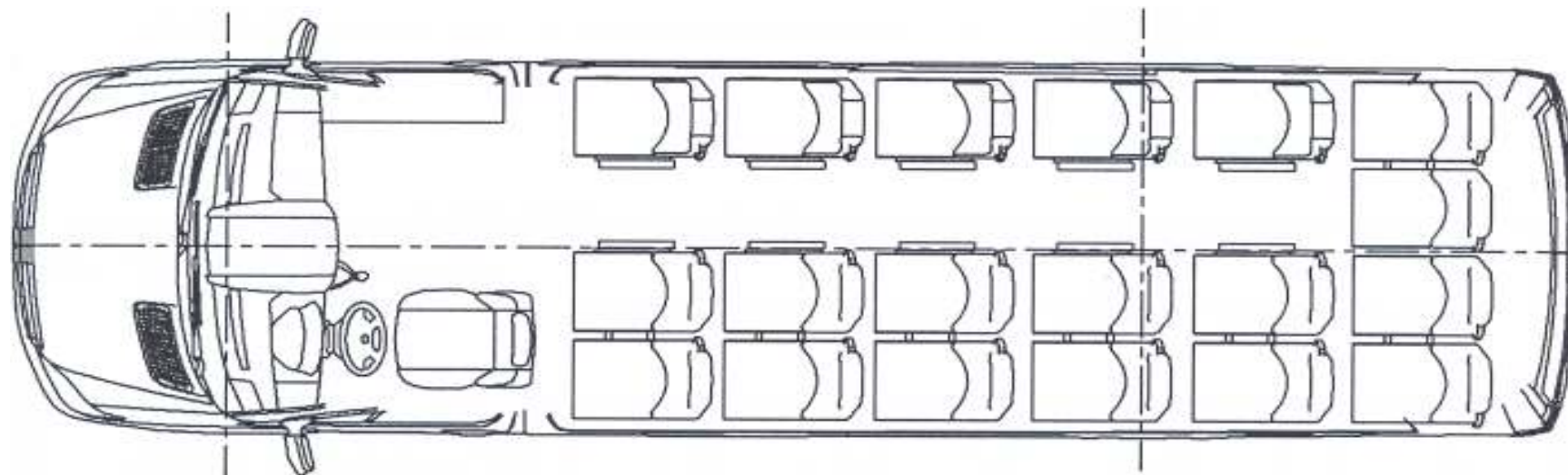
Informal document No. GRSG-95-24  
(95th GRSG, 21 – 24 October 2008  
agenda item 3(e))

## **Bus & Coach directive** (2001/85/EC)

*Would such a vehicle configuration obtain  
a type-approval certificate in your country?*

**Type Approval Authorities Meeting**  
Edinburgh, 9-10 October, 2008







**Bus wypadł z drogi i dachował.**  
**Trzech naszych rodaków nie żyje**





**Bus wypadł z drogi i dachował.  
Trzech naszych rodaków nie żyje**





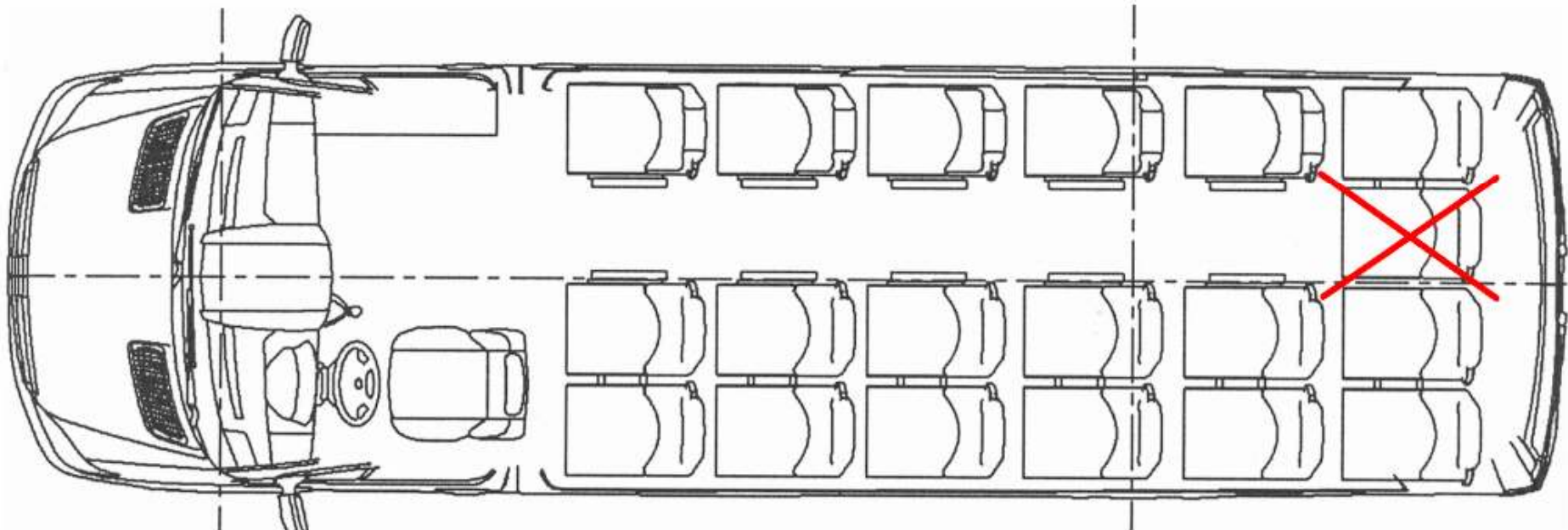
**Bus wypadł z drogi i dachował.  
Trzech naszych rodaków nie żyje**





**Bus wypadł z drogi i dachował.  
Trzech naszych rodaków nie żyje**





Legal issue:

The paragraph 7.6.1.1. of the directive 2001/85/EC  
(and of the UN ECE Regulation No. 107.02)  
says:

**“The minimum number of doors in a vehicle shall be two,  
either two service doors or one service door and one  
emergency door...”**



Legal issue:

The paragraph 7.6.1.1. of the directive 2001/85/EC  
(and of the UN ECE Regulation No. 107.02)

says:

**“The minimum number of doors in a vehicle shall be two,  
either two service doors or one service door and one  
emergency door...”**

Question:

**Should the driver’s door be considered as an emergency  
door or emergency exit?**



Answer:

**The driver's door should ONLY be considered as an emergency EXIT.**

Justification:

**The emergency DOOR should provide an unobstructed way of evacuation. In case of a roll-over or tip-over accident (as presented), a vehicle in question does not provide such life-saving provision. The service door is blocked, the driver's door is very hard to open from the inside and the driver, if dead or injured, is an obstacle that is quite impossible to pass.**

**So, the driver's door should ONLY be considered as an emergency EXIT, i.e. a secondary means of evacuation, like an escape hatch that is just another example of emergency exit.**





Also:

- 1) The issue discussed in Borlänge three years ago was about the assesment of the minimum dimensions necessary to avoid squeezing between steering wheel and the driver's seat in order to enable the driver's door be used as an emergency exit. That was also clearly reflected in Dr. R. Schulte-Braucks letter to Mr. Lennartsson (Subject: Driver's door as an emergency exit in vehicles of Class B):**

Recently, an amendment to UN/ECE Regulation 52<sup>1</sup> concerning certain construction aspects of small capacity vehicles (such as the Strada minibus constructed by Indcar in Spain) has entered into force. Paragraph 5.7.2.4.2. of Regulation 52 as amended clarifies how to check the minimum free-space which must be provided between the steering wheel and the seat back in order to allow access to passengers, from the passenger compartment to the driver's door, so that the door can be regarded as an emergency exit.



- 2) The paragraph 5.6.2.3. of the UN ECE Regulation No. 52.02) says:  
“The forward half and the rearward half of the passenger space shall each contain at least one exit.”

**This requirement is also not met by the vehicle in question.**

Conclusion:

**The vehicle configuration in question should NOT obtain a type-approval certificate.** That should only be possible if there is a free access to the rear door that would then be the emergency door, i.e. by removal of one seat from the rear row.

Consequently:

**If the decision of today’s TAAM permits, Poland will prepare a relevant proposal for the April 2009 GRSG to amend the UN ECE Regulation 107.02.**



Thank you for your kind attention.

