

Draft Supplement 1 to UN R140 (Electronic Stability Control)

OICA proposal to amend ECE/TRANS/WP.29/2018/61

a) Proposal

Paragraph 5.1, amend to read:

“5.1 Vehicles **submitted to approval to UN R140** shall be equipped with an ESC system that meets the functional requirements specified in paragraph 6. and the performance requirements in paragraph 7. under the test procedures specified in paragraph 9. and under the test conditions specified in paragraph 8. of this Regulation.”

b) Justification

Specifications for Electronic Stability Control systems (ESC) were originally included in UN R13H. However, these systems were never meant to be mandatorily fitted to vehicles for UN R13H approval, but were considered as "if fitted" requirements (e.g. Paragraph 4.4.3. specified that "In the case of a vehicle complying with the Electronic Stability Control and Brake Assist System requirements of Annex 9 to this Regulation ..."). ESC systems were subsequently transferred to a new UN Regulation (UN R140) in order to respect the "if fitted" principle under IWVTA.

OICA understands that the aim of document ECE/TRANS/WP.29/2018/61 is to prevent a vehicle not equipped with ESC to get a UN R140 approval. OICA agrees with this aim, but fears that the proposed wording "Vehicles shall be equipped ..." risks to be misunderstood as being a mandatory installation requirement for all Contracting Parties applying UN R140 without mandating it.

OICA consequently proposes a slight modification to the proposal to clarify the aim. This will not prevent individual (or regional) Contracting Parties to apply UN R140 on a mandatory basis if they so wish.
