

**Informal Group on gtr No 9 – Phase 2 (IG GTR9-PH2)  
8<sup>th</sup> meeting, Paris/France, 9 – 10 September 2013**

# **Request for Transitional Provisions for FlexPLI Usage**



Presented by the pedestrian safety experts of the  
International Automobile Manufacturers' Organization (OICA)

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## **OICA requests to add the following statements to the preamble:**

X1. Regarding the applicability of this amendment of the gtr, it should be again noted that the requirements of the draft gtr amendment are more severe than any existing legislation. In addition, many countries do not yet have pedestrian safety requirements.

It is therefore recommended that Contracting Parties implementing this amendment of gtr allow adequate lead time before full mandatory application, considering the necessary vehicle development time and product lifecycle.

For the introduction of all new models it is recommended that contracting parties adopting these amendments should apply a transitional period of a minimum of 36 months from the date of entry into force of this amendment.

## **OICA requests to add the following statements to the preamble:**

X2. The simultaneous application of the EEVC legform impactor and the FlexPLI in various regulative and consumer rating requirements worldwide can lead to market distortions and an unnecessary burden on manufacturers. Therefore it is recommended that Contracting Parties shall implement this amendment for compliance at the earliest possible date as an option at the choice of the car manufacturer.

However in those regions where there is existing legislation relating to legform testing with the EEVC legform impactor, vehicles approved to this legislation, already provide for protection from leg impact injuries. Where this is the case, a review of costs and benefits of changing to the use of the Flex PLI may not be justified if it were to require a general redesign of existing vehicle types. Vehicles designed and proven to comply with the requirements for the EEVC LFI should therefore be exempted from meeting the FlexPLI requirements in all markets.



**THANKS**

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