

ADS IWG Working Document
Change Proposal Form
One major comment per form
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Document Reference

ADS-14-23

Date

8 October 2025

Agenda item

Proposed by (affiliation only—no personal information)

SAE

Summary of Change (25 words or less)

Changes “sum of” to “aggregate residual” in review of manufacturer’s unreasonable risk determination.

Reason for Change (Justification)

The use of "sum" gives the wrong impression of a purely quantitative aggregation, when the provision itself notes that the determination has both quantitative and qualitative aspects.

Location

8.3.1.4.

Original text

8.3.1.4. The approval authority or its designated technical service shall review the manufacturer's safety case for robustness to verify that at least the following criteria have been met:

(a) All identified risks in the safety concept have been reduced, mitigated or accepted and the sum of risk (quantitative or qualitative) is below the unreasonable risk threshold,

Revised text

8.3.1.4. The approval authority or its designated technical service shall review the manufacturer's safety case for robustness to verify that at least the following criteria have been met:

(a) All identified risks in the safety concept have been reduced, mitigated or accepted **and the aggregate residual** ~~sum of~~ risk (quantitative or qualitative) is below the unreasonable risk threshold,