

ADS IWG Working Document  
Change Proposal Form  
One major comment per form  
(Shaded blocks for use by the IWG Secretariat)

Document Reference

ADS-19-25

Date

10 February 2026

Agenda item

Proposed by (affiliation only—no personal information)

United Kingdom (DDT OPI)

Summary of Change (25 words or less)

Clarify the requirement only refers to collisions involving ORU or nontrivial damage

Reason for Change (Justification)

Over many meetings concerns have been raised that this requirement could mean that very minor incidents would be a noncompliance with the regulation. However, there was also concern that we should be careful to avoid weakening this requirement or conflicting with traffic rules.

The solution was to include any collision with an ORU (so causing a collision involving a pedestrian is always a violation) and then using the non-trivial damage threshold from safety relevant object.

The definition for safety relevant object is not amended at this time though it could potentially be improved for phase 2.

Location

4.1.2.1/6.1.2.1

Original text

6.1.2.1. The driving behaviour of the ADS shall not cause a collision.

Revised text

6.1.2.1. The driving behaviour of the ADS shall not cause a collision **involving an ORU or resulting in non-trivial physical damage.**