

ADS IWG Change Request

One request per form
Please submit requests as separate documents
Shaded blocks for use by secretariat

Date	21 April 2026	Please use month name (e.g., "January")
Document	ADS-20-45	
Agenda Item	5.11.	
Submitted by	China	Affiliation only—No personal information
Title	" Failure to meet the ADS requirements under paragraph 6 of this Regulation"	25 words or less (used to post document)
Location	Annex 1/3 List of reportable occurrences by reporting type	e.g., impacted section, paragraph number(s)
Summary	Delete example "collision " under "Failure to meet the ADS requirements under paragraph 6 of this Regulation"	<input type="checkbox"/> Accepted <input type="checkbox"/> Accepted as amended <input type="checkbox"/> Deferred (further discussion) <input type="checkbox"/> Not accepted <input type="checkbox"/> Withdrawn

Original Text

1. "Failure to meet the ADS requirements under paragraph 6 of this Regulation"
Failures include:

- Systematic or repeated deviations from the DDT performance requirements defined under paragraph 6;
- Safety case assumptions related to ADS performance of the DDT violated under real-world operation;
- Unexpected degradation of the performance thresholds as indicated in the safety case;
- Collisions;
- Deviation from Remote Interaction/Intervention as described in the Safety case.

Revised Text

2. "Failure to meet the ADS requirements under paragraph 6 of this Regulation"
Failures include:

- Systematic or repeated deviations from the DDT performance requirements defined under paragraph 6;
- Safety case assumptions related to ADS performance of the DDT violated under real-world operation;
- Unexpected degradation of the performance thresholds as indicated in the safety case;
- ~~Collisions;~~
- Deviation from Remote Interaction/Intervention as described in the Safety case.

Rationale

“collision” is not a propriate example of “Failure to meet the ADS requirements under paragraph 6 of this Regulation”.

Not all collisions happened to ADS vehicle are considered to be failed to meet the ADS requirements under paragraph 6 .Some collisions are not caused by ADS or ADS vehicle , and some collisions are not avoidable, for example suddenly appearing ORU.

Section 6.1.3.2. says “ When a collision cannot be avoided, the ADS shall aim to mitigate its severity.”

The note of section 6.1.2.1 : It is acknowledged that establishing causation can be complex, and not always possible. However, where it is established that the behaviour of an ADS caused a collision, this is a non-compliance with this requirement.

Discussion

--