

Proposal for amendments to document SG-EDR-01-02-EDR Working Draft-Rev3

Due to the fact that the EDR Regulation must be adopted by 2022, and the text should be performance based on the technical neutral. It shall be prepared in a neutral form so that it can be adapted for use under the 1958 Agreement and 1998 Agreement.

With the regard to the scope of a general text for the 1998 agreement, the different industrial situations between the various countries and regions should be considered.

The modifications to the existing text of the draft Regulation (see SG-EDR-01-02-EDR Working Draft-Rev3) are marked in bold for new or strikethrough for deleted characters.

I. Proposal

Paragraph 1.1., amend to read:

- 1.1. These performance elements apply to all passenger cars and light duty vehicles (vehicle categories according to R.E.: M1, N1. ~~[Should we use harmonized 58/98 agreement categories 1, 1, and 2, with a gross vehicle mass (GVM) of 3,855 kilograms or less instead?]~~

- ~~— [Remark: reflect in the scope~~
- ~~— that EDR regulation does not require systems to be fitted to a vehicle~~
- ~~— define “mandatory if equipped”~~
- ~~— clarify that retro fitted devices are not in the scope~~
- ~~— clarify that any requirements on the VIN are excluded from this regulation (subject to national law)~~
- ~~US would like it to be clear that nothing in this regulation should require changes to existing architectures.]~~

II. Justification

1. The structure of N1 category vehicles varies greatly in different nations and regions.
2. The N1 category vehicles include light duty truck, pickup, micro truck, Van (converted from passenger cars) , and so on. The types and technical conditions of N1 category vehicles are very different.
3. China N₁ category vehicle production in 2019 is about 1.69 million, the vehicles that are equipped with CAN-bus are less than 50 percent, and most of CAN-bus doesn't meet the requirements of data communication.
4. The percentage of vehicles that are equipped with the airbag is only about 20 percent in China N₁ category vehicles, within which most of them are only pickup. So, it is very difficult to press all N₁ category fulfill the requirements of the current EDR Regulation draft, because most EDR systems are based on the airbag control unit (ACU).
5. A brief summary: most N1 category vehicles in China are not equipped with the CAN-bus and airbag in the meantime, and the EDR can't work in such products. Thus, the EDR regulation shall not be applicable to all N1 category vehicles now.
