

Proposal for amendments to the working documents ECE/TRANS/WP.29/2025/104 and the ECE/TRANS/WP.29/GRSG/2025/12 concerning 02 Series of Amendments to UN Regulation No. 73

The modifications to ECE/TRANS/WP.29/2025/104 and ECE/TRANS/WP.29/GRSG/2025/12 are marked in bold characters and strikethrough for deleted characters. The modifications to ECE/TRANS/WP.29/2025/104 proposed in ECE/TRANS/WP.29/GRSG/2025/12 are marked in italics, strikethrough for deleted characters and underlined.

I. Proposal for amendment of ECE/TRANS/WP.29/2025/104

Paragraph 11.11., amend to read:

‘11.11. The requirement for the height of the lower edge of LPD as specified in paragraphs 12.8. and 15.6. as amended by the 02 series of amendments are not compulsory for the purpose of granting type-approval to the 02 series of amendment, until 1 September ~~2034~~ **2044**. These exemptions shall remain applicable in the case of extensions of approvals first granted before 1 September ~~2034~~ **2044**.’

Paragraph 13.3., amend to read:

"13.3. Vehicles where any LPD (e.g. fixed, removable, foldable, adjustable, etc.) is incompatible with their on-road use may be partly or fully exempted from this Regulation, subject to the decision of the Type Approval Authority."

13.3.1. For vehicles of category N2G, N3G and their vehicle bodywork (1), where any LPD is incompatible with their off-road use, the Type Approval Authority may decide that the lower edge of LPD shall at no point be more than 550mm above the ground.

- **Bodywork, chassis parts or other components, such that, by virtue of their shape and characteristics, these elements can be regarded as totally or partially fulfilling the function of the LPD.**

Paragraph 16.2., amend to read:

"16.2. Vehicles where any LPD (e.g. fixed, removable, foldable, adjustable, etc.) is incompatible with their on-road use may be partly or fully exempted from this Regulation, subject to the decision of the Type Approval Authority."

16.2.1. For vehicles of category N2G, N3G and their vehicle bodywork (1), where any LPD is incompatible **with their off-road use, the Type Approval Authority may decide that the lowe edge of LPD shall at no point be more than 550mm above the ground.**

- **Bodywork, chassis parts or other components, such that, by virtue of their shape and characteristics, these elements can be regarded as totally or partially fulfilling the function of the LPD."**

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Paragraph 11.12., amend to read:

11.12. Notwithstanding the transitional provisions above, Contracting Parties whose application of this Regulation comes into force [on or] after the date of entry into force of the *02 ~~most recent~~* series of amendments are not obliged to accept approvals which were granted in accordance with *paragraph 11.11. of the 02 series of amendments and* any of the preceding series of amendments to this Regulation. **If**

such a Contracting Party chooses not to accept approvals which were granted in accordance with paragraph 11.11. of the 02 series of amendments to this Regulation, it shall notify the Secretariat accordingly

II. Justification

The proposed text:

- amends the document ECE/TRANS/WP.29/2025/104 to further take into account the impact of the modified requirement for the height of the lower edge of LPD on the Contracting Parties, including the need to adapt the infrastructure ;
- amends the document ECE/TRANS/WP.29/GRSG/2025/12 to ensure equal treatment of all Contracting Parties signatories to this UN Regulation.