Proposal for the 01 Series of Amendments to UN Regulation No. 122 (Heating Systems)

Submitted by the expert from the Kingdom of the Netherlands on behalf of the Task Force on Automated Vehicles Regulatory Screening*

The text reproduced below was prepared by the Task Force on Automated Vehicles Regulatory Screening (TF-AVRS), with the aim to amend and supersede document ECE/TRANS/GRSG/2025/35. The modifications to ECE/TRANS/GRSG/2025/35 are marked in (bold) red for new or strikethrough for deleted characters.

^{*} In accordance with the programme of work of the Inland Transport Committee for 2025 as outlined in proposed programme budget for 2025 (A/79/6 (Sect. 20), table 20.6), the World Forum will develop, harmonize and update UN Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.

I. Proposal

Insert new paragraphs 0. and 0.1. to 0.1.4., to read:

"0. Introduction

- 0.1. The 01 series of amendments is introduced to take into account vehicles of categories X and Y¹, and to align the provisions in Annex 5 for all occupants.
- 0.1.1. It was noticed by GRSG experts, that for the allowed surface temperatures, it should not matter whether the occupant is performing the Dynamic Driving Task (DDT) (i.e. is the driver) or is a passenger and it also should not matter if an occupant is sitting in the front seat row or a rear seat and/or in which vehicle category.
- 0.1.2. Special care shall be given to rear seats of M_1 , since they are the typical seating positions to carry children.
- 0.1.3. Therefore, GRSG in its 128th session, decided that TF-AVRS would take this topic on board their work to update the Regulation for the purpose of fitness for Autonomous Automated Driving System (ADS)¹. It helps TF-AVRS, to be able to have the same provisions for driver and passengers, i.e. for all occupants and increases the level of safety with regard to minimising the risk of burns.
- 0.1.4. Paragraph 2 already provides for the possibility for manufacturers to justify in a safety concept to allow for higher temperatures without increasing the risk for occupants to get burns."

Paragraph 1.1. and 2.2., footnote 1, amend to read:

"1 As defined in Annex 7 to the Consolidated Resolution on the Construction of Vehicles (R.E.3) (document TRANS/WP.29/78/Rev.1/Amend.2, as last amended by Amend.4).

As defined in the Consolidated Resolution on the Construction of Vehicles (R.E.3.), document ECE/TRANS/WP.29/78/Rev.8, para. 2 -

https://unece.org/transport/vehicle-regulations/wp29/resolutions"

Paragraph 2.7., amend to read:

2.7. "Passenger compartment" means the interior part of the vehicle used to accommodate the driver and any passengers occupants.

Paragraph 5.2.1., amend to read:

5.2.1. The passenger compartment of everyIn case the vehicle has a passenger compartment, it shall be fitted with a heating system A heating system shall be fitted to each passenger compartment (as applicable) within the vehicle. If a heating system for the load area is provided in a vehicle, it shall comply with this Regulation.

Insert new paragraphs 12. and 12.1. to 12.5., to read:

"12. Transitional provisions

12.1. As from the official date of entry into force of the 01 series of amendments, no Contracting Party applying this Regulation shall refuse to grant or refuse to accept type approvals under this Regulation as amended by the 01 series of amendments.

- 12.2. As from 1 September 2028, Contracting Parties applying this Regulation shall not be obliged to accept type approvals to the preceding series of amendments, first issued after 1 September 2028.
- 12.3. Contracting Parties applying this Regulation shall continue to accept type approvals issued according to the preceding series of amendments to this Regulation first issued before 1 September 2028.
- 12.4. Notwithstanding paragraph 12.2., Contracting Parties applying this Regulation shall continue to accept type approvals of the equipment/parts issued according to the preceding series of amendments to this Regulation.
- 12.5. Notwithstanding paragraph 12.2., Contracting Parties applying this Regulation shall continue to accept type approvals issued according to the preceding series of amendments to this Regulation, for the vehicles which are not affected by the changes introduced by the 01 series of amendments."

Annex 5, paragraph 2., amend to read:

"2. Surface Temperature

The surface temperature of any part of the heating system likely to come into contact with any occupant of the vehicle during normal road use shall be measured with a contact thermometer. No such part or parts shall exceed temperature limits defined in **the** paragraphs below unless the manufacturer can demonstrate during the type approval process that their safety concept covers for higher temperatures without increasing the risk for occupants to get burns compared to the risk caused by the temperatures below. Any such demonstration and documentation shall be appended to the test report. The possibility to exceed these temperatures, does not apply to vehicles of categories M₂ and M₃ other than for the driver and for passengers seated in the row adjacent to the driver."

Annex 5, Paragraph 2.1., amend to read:

"2.1. The surface temperature of any part of the heating system likely to come into contact with the driver and/or passengers of occupants in the vehicle, during normal road use, is limited to 70°C for uncoated metal or 80°C for other materials."

Annex 5, Paragraphs 2.2. and 2.3. shall be deleted.