Informal document No. **GRE-56-18**
(56th GRE, 4-7 April 2006
agenda item 4.1.)

Transmitted by the expert from the Netherlands

NETHERLAND'S COMMENTS ON PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 48
(Emergency Stop Signals (ESS))

Note: The text reproduced below was prepared by the expert from the Netherlands in order to comment on the proposal transmitted by the Chairman of the joint GRE/GRRF expert meeting on Emergency Stop Signals (ESS) (see ECE/TRANS/WP.29/GRE/2006/31).

A. BACKGROUND

For more than six years now GRE is discussing the introduction of a separate signal in cases of emergency braking. Many documents, formal and informal, have been transmitted by numerous experts. This topic has been extensively discussed not only during the regular sessions of GRE but also at many informal meetings. The experts from Contracting Parties as well as from industry participated in these meetings. The reason for the informal meetings was that it had not been possible to reach an agreement during the regular GRE sessions.

B. COMMENTS

First of all, the Netherlands would like to express their thanks to those manufacturers who have really seriously researched and explored certain possibilities for an Emergency Stop Signal.

However, despite the fact that, even to date, there are still no provisions at all for ESS, a number of vehicle manufacturers already installed their own ESS-systems, without officially applying for an exemption for application of new technology (the well-known "8(2)(c) procedure" within the EU framework Directive), on some of their vehicles in the European market. The Netherlands have always disagreed with such practices, i.e. those without the proper authorization for exemption, and find them regrettable.

In fact, we believe that the diversity of the existing manufacturer's own ESS-systems is a main reason why, after years of discussion, there is still no solution. The often unmitigated inflexibility from their side, which has made their positions virtually impervious to adjustment, may have been caused by the fact that some of them are trying only to defend their own system.

The expert from the Netherlands has consistently advocated during all discussions that whatever the specific outcome would be, it should always be just one signal. One unique signal, not different signals to indicate the same event. We feel that now the time has come that the Contracting Parties must, once and for all, cut the knot and make a decision.

The Netherlands strongly disagree to "give away" two new signals for one event, i.e. emergency braking. Therefore, we have strong objections to the proposals contained in those paragraphs of document ECE/TRANS/WP.29/GRE/2006/31, which allow two different signals. These objections where already raised many times by the expert from the Netherlands, both during previous sessions of GRE as well as during the joint GRE/GRRF expert meetings on ESS.

Any new signal may be useful for (an) other event(s) in the future, currently not anticipated. The Netherlands believe that it is the duty of GRE to be extremely cautious and reserved when it comes to allowing the introduction of new lighting signals. One must bear in mind that eventually millions of road users will be confronted, sooner or later, with these new signals and that they will have to understand what are the meanings of these signals.

Therefore, to our opinion, we can not simply just introduce two new signals with a justification saying: *"The objective of the experts of GRE was to establish a single, unique emergency stop signal. After much discussion, and consideration of research conducted and systems on the market, the experts have, unfortunately, only been able to partially meet this objective."*

Nevertheless, the Netherlands would like, as the last resort, to suggest the following:

By lack of identifying any "best" signal, to simply choose one, which we'll all have to live with. Then, with one unique signal for emergency braking, the remaining other provisions, contained in document ECE/TRANS/WP.29/GRE/2006/31, are in principle acceptable.

In any case, if no consensus can be found to finally come to one unique signal, the Netherlands would then rather prefer not to have any signal at all, for emergency braking.

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