

Transmitted by the expert from GTB

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agenda item 9(b))

Informal document to GRE on amber position lamps (APL)

1. Background

At the 60th session of GRE, Japan made the proposals contained in GRE/2009/5.

At present Japan does not require a position lamp but if it is fitted it can be either white or amber. Based on the JARI research, the Japanese administration believes that apl will improve conspicuity and therefore safety. For this reason they propose that apl should be made mandatory in Regulation 53.

IMMA's position on this proposal is set out below.

2. IMMA position

IMMA opposes mandatory apl for the following reasons:

1. IMMA does not accept the JARI research, because:
 - the JARI tests were not blind tests, the observers knew what the experiment was for
 - IMMA research, as presented to the ISAL Conference in 2007, shows that there is a significant difference in results between blind and informed subjects
 - IMMA research also shows that apl does not make any difference when added to a headlamp, positively or negatively, so there is no safety benefit to be expected from apl
 - the tests were based on a detection methodology and did not show that there was any change in behaviour
 - therefore IMMA does not agree that the JARI tests show that apl improve conspicuity
2. The proposal would mean that all European production would have to be modified and this is unacceptable to IMMA, given the absence of any benefit
3. A Contracting party is allowed to accept other options when it signs an ECE Regulation, the regulation provisions do not have to be made into the only specification allowed. So Japan has the possibility of allowing apl in national legislation, as an alternative to the requirements of Regulation 53, and this will allow manufacturers to continue to provide apl-equipped motorcycles for the Japanese market. It is not necessary to make apl mandatory in R53.

Dr NM Rogers
