Comments by the expert from the EC on paragraph 7.6.11.1. concerning the use of a pictogram to identify emergency exits (see ECE/TRANS/WP.29/GRSG/2006/5)

While supporting the objective of the proposal by OICA, the European Commission has expressed concerns about the use of the proposed ISO pictogram to identify emergency exits, instead of a textual marking. The purpose of this paper is to re-explain the position of the EC.

EC Directive 2001/85/EC includes provisions for the identification of emergency exits. This Directive has been transposed into national law by the Member States and some of them require compliance with the Directive for national type-approval purposes. The relevant paragraph of the Directive is the following:

"7.6.11. Markings

7.6.11.1. Each emergency exit shall be marked, inside and outside the vehicle, by an inscription reading, for example:
"Emergency exit"
"Issue de secours"
"Salida de emergencia"
[...]
supplemented, where appropriate, by one of the symbols shown in Annex II, paragraph 3.4. of Council Directive 92/58/EEC."

The pictograms described in Annex II of Directive 92/58/EEC are used to identify emergency exits and escape routes. They include an arrow to show the direction to be followed. According to Directive 2001/85/EC, the purpose of the pictogram to be added to the textual marking is clearly to supplement the information intended for passengers.

More commonly, the pictograms referred to in paragraph 3.4. of Annex II are used in corridors in public buildings to show the route to find exits. At the exit itself (or in front of the exit), another pictogram - a rectangle plus an arrow- is used.

The EC is concerned by the fact that the pictogram would be used in coaches for purposes other than the one commonly admitted, which could create confusion for the passengers. For this reason, the EC is not keen to support this point of the OICA proposal.

It has to be pointed out that some manufacturers are using other pictograms on emergency windows which could probably serve as a reference. Therefore, the EC believes that ISO relevant committee should be invited to consider this issue.