

Transmitted by the representative of the
European Community

Informal Document No. **WP.29-148-09**
(148th WP.29, 23-26 June 2009,
agenda item 20.1.)

Proposal to amend global technical regulation No. 6
(Safety glazing)

The proposal is submitted to the Executive Committee (AC.3) of the 1998 Global Agreement at its session of June 2009. If adopted by AC.3, the proposal would be referred to the Working Party on General Safety for consideration (Article 6 of the 1998 Agreement).

I. STATEMENT OF TECHNICAL RATIONAL AND JUSTIFICATION

A. Introduction

1. The objective of this proposal is to amend global technical regulation (gtr) No. 6 regarding safety glazing materials for motor vehicles and motor vehicle equipment.
2. The technical provisions of gtr No. 6 are intended to ensure a good view of the road to the driver without causing any distortion in his vision. It also ensures that objects or stones thrown against the glazing do not penetrate into the occupant compartment and that occupants are not ejected in the event of a crash.
3. The proposed draft global technical regulation (Re: ECE/TRANS/WP.29/2008/47) was established in the Global Registry on 12 March 2008 by consensus of the Contracting Parties.
4. At the March 2008 Session of the Executive Committee, the European Community as a Contracting Party of the 1998 Agreement voted in favour of establishing that global technical regulation.
5. As of 19 November 2008, the European Commission has begun its consultations with a view to including the technical provisions of gtr No. 6 into UNECE Regulation No. 43 as the European Union has the intention to repeal its own legislation on safety glazing materials and to replace it by that Regulation as amended.
6. On 2 April 2009, the *European Association of Automotive Suppliers* (CLEPA) and the association *Glass for Europe* (GFE, ex-GPVP, Association of Flat Glass manufacturers) which includes major companies active in the automotive sector, AGC Glass Unlimited, Pilkington NSG Group flat glass business, Saint-Gobain Glass, SISECAM, together with Guardian Europe drew the attention of the European Commission on the consequences of transferring into UNECE Regulation No. 43 the general requirements on markings included in Section 4 of Part B of gtr No. 6.

B. Justification of changes

7. The unique change can be summarised as follows:

Amend “**Paragraph 4.1.2. Identification marks**”

8. With respect to safety glazing materials, the marking refers to the nature and to the main characteristics of the safety glazing materials. It allows a clear identification of the products installed on a vehicle, which facilitates checks by the authorities in charge of vehicle type-approval or registration of vehicles. These mechanisms have been in force in Europe for decades and have proved to work to the satisfaction of the governmental authorities and the industry. On these grounds the group of experts on safety glazing decided to include such a nomenclature in the proposal for a gtr. The logic of the sequence of numbers was at that time recognised and agreed.

9. The main identifier for the nature of the safety glazing is the roman figure at the beginning of the marking. In Contracting Parties applying Regulation No. 43 the roman figure supplements the type-approval number reflecting the approval granted to the type of the safety glazing material (see an example in annex).
10. It appears as a matter of fact that the nomenclature in gtr No. 6 differs slightly from the one which is included in the current version of UNECE No. 43.
11. Following an in-depth assessment of the technical requirements of gtr No. 6, it appears that there is only a small number of substantial technical changes to be brought to the current European legislation. As a consequence and from the practical perspective manufacturers would have just to update their approvals after gtr No. 6 has been transposed into UNECE Regulation No. 43. In most cases, it would suffice to update type-approval certificates. Such operation does not lead either to a change in the type-approval number nor in the marking.
12. For the production of windscreens and glazing panes no change in the marking of the products would be necessary, which means no change in the production tools.
13. By contrast if the codification system of the safety glazing is to be changed because of the transposition of the gtr into UNECE Regulation most of the markings would be affected. Consequently a huge number of adaptations to the production tools would have to be made, which in turn would lead to higher costs for negligible benefits.
14. In addition, the fact of having different markings for the same physical product would be confusing to everybody.
15. When considering the arguments presented by professional associations of the sector, the European Community has noted that no transposition of gtr No. 6 has been so far completed. The European Community can assume that changes in the production process have not yet been planned, which gives Contracting Parties sufficient room and time for reviewing the nomenclature of the codification system.
16. In its proposal, the European Community sought to minimise the number of changes as far as possible. A meaningful example is given in Annex to illustrate the change in the marking of tempered glass panes which would be necessary.
17. To summarise:
The purpose of this proposal is to suggest adopting a revised nomenclature in Section 4 of Part B of gtr No. 6, Paragraph 4.1.2. 'Identification marks' which would bring them in line with the current system in use for safety glazing compliant with UNECE Regulation No. 43.
18. *No change to the current markings would therefore be required from the Contracting Parties applying UNECE Regulation No. 43.*

Annex: Example of change in the marking structure for Contracting Parties applying UNECE Regulation No. 43

ANNEX ¹

**CHANGE IN THE TYPE-APPROVAL MARKING
IN ACCORDANCE WITH UNECE REGULATION NO. 43**

1. Current



43 R - 002439

Approval number for uniformly toughened glass in accordance with current UNECE Regulation No. 43.

2. Future



43 R - 002439

Approval number for the same glazing in accordance with future UNECE Regulation No. 43 (i.e. as in gtr No. 6).

¹ This Annex is not part of the proposal. It has the sole purpose of illustrating the problem raised.

II. PROPOSED AMENDMENTS

Section 4 General requirements

Paragraphs 4.1.2.1 to 4.1.2.3 *amend to read*

- 4.1.2.1. Identification marks for windscreens.
- 4.1.2.1.1. "II" for laminated-glass.
- 4.1.2.1.2. "~~III~~" "IV" for glass-plastics.
- 4.1.2.2. Identification marks for panes.
- 4.1.2.2.1. "F" **no symbol** is required for uniformly toughened glass.
- 4.1.2.2.2. "~~IV~~" "XI" for laminated glass.
- 4.1.2.2.3. "V" "VI" for a double glazed unit.
- ~~4.1.2.2.4. "VI" for glass-plastics.~~
- 4.1.2.3. Additional identification marks.
- 4.1.2.3.1. Glazing faced with plastic shall be marked with "/P" after the mark required by paragraph 4.1.2.1. or 4.1.2.2., e.g., II/P.
- 4.1.2.3.2. Glazing with a light transmission of less than 70 per cent shall be marked with "~~/RLT~~" "V" after the mark required by paragraph 4.1.2.2., e.g. I/RLT.
- 4.1.2.3.3. If glazing requires both the "/P" and the "~~/RLT~~" "V", the mark required by paragraph 4.1.2.3.1 shall precede the mark required by paragraph 4.1.2.3.2.