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**COMMENTS BY THE EUROPEAN COMMISSION EXPLAINING ITS POSITION
CONCERNING THE USE OF A PICTOGRAM TO IDENTIFY EMERGENCY EXITS
IN REGULATION No. 107**

(M₂ and M₃ vehicles)

Submitted by the expert from the European Commission (EC)

Note: The text reproduced below was prepared by the expert from the EC and is aimed to explain the EC position on the use of a pictogram to identify emergency exits in the Regulation. The text is based on informal documents Nos. GRSG-90-24 and GRSG-90-27, distributed during the ninetieth GRSG session (ECE/TRANS/WP.29/GRSG/69, para. 9).

Note: This document is distributed to the Experts on General Safety Provisions only.

A. BACKGROUND

At its ninetieth session, GRSG adopted draft Supplement 1 to the draft 02 series of amendments (ECE/TRANS/WP.29/GRSG/2006/5). While supporting the proposal in general, the expert from the EC expressed his concerns about the use of the proposed ISO pictogram to identify emergency exits, instead of a textual marking. The purpose of this document is to re-explain the position of the EC on this issue.

B. LEGISLATIVE REQUIREMENTS IN THE EUROPEAN UNION (EU)

The EU Directive 2001/85/EC includes provisions for the identification of emergency exits in the vehicles of categories M₂ and M₃. This Directive has been transposed into the national laws of the EU Member States and some of them require compliance with the Directive for national type approval purposes. The relevant paragraph of the Directive reads as follows:

"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 on the minimum requirements for safety/health signs at work are used to identify emergency exits and escape routes. They include an arrow to show the direction to be followed. According to the EU Directive 2001/85/EC, the purpose of the pictogram to be added to the textual marking is to clearly supplement the information intended for passengers.

More commonly, the pictograms referred to in paragraph 3.4. of Annex II of Directive 92/58/EEC are used in corridors in public buildings to show the route to find exits. At the exit itself (or in the front of the exit), another pictogram - a rectangle plus an arrow- is used (see Figure 1).

C. CONCERNS BY THE EC

The EC is concerned by the fact that the proposed pictogram would be used in coaches for purposes other than ones commonly admitted and, therefore, could create a confusion for the passengers. For this reason, the EC was not keen to support paragraph 7.6.11.1. of Annex 3 of ECE/TRANS/WP.29/GRSG/2006/5.

It has to be pointed out that some manufacturers use other pictograms on emergency windows which could probably serve as a reference (see Figure 2). Therefore, the EC believes that ISO relevant committee should be invited to consider this issue.

**EN CAS D'EVACUATION
IN CASE OF EVACUATION**



Figure 1



Figure 2
