



Informal document N° 10
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agenda item 3 (d) (iii))*

OICA POSITION ON DOCUMENT TRANS/WP15/1999/43

RETRO-REFLECTIVE CONTOUR MARKINGS

Although ECE Regulation N° 104 (Retro-reflective markings for heavy and long vehicles and their trailers) has entered into force on 15 January 1998, the above proposal goes contrary to the intended purpose of this Regulation.

It is also surprising to note that, at our knowledge, no EC proposal on the same subject is available in the framework of amendments to EC Directives.

OICA comments on document TRANS/WP15/1999/43 are as follows :

Paragraph 1 : This very general statement would necessitate confirmation by accident statistics especially for night traffic.

Paragraph 2 : As from 1994, the lateral visibility of heavy goods vehicles has been improved by the mandatory fitting of side marker lamps : these lamps are visible in all directions without the need of external light to be reflected in. Furthermore, side-reflectors and rear reflective plates, in addition to rear lights, are mandatory on heavy duty vehicles.

Paragraph 3 : No comment.

Paragraph 4 :

Any available information on the effectiveness of retro-reflective contour markings should be produced to justify this statement. A comparison should be made on vehicles produced later than 1994 when side marker lamps became mandatory.

Regulation N° 104 allows for well specified retro-reflective marking materials to be type approved. Annex 9 contains only suggested guidelines for the mounting of such markings, if any.

At GRE (Working Party on Lighting and Light-signalling), a number of governments placed a reservation to their agreement on this draft Regulation which led to the note in the additional Annex 9 : « Nothing in this annex shall preclude the national authorities to impose requirements differing from these guidelines. ». Regulation N° 48 (Installation of the lighting and light signalling devices) does not contain any mention of contour marking.

Consequently, OICA considers that even « optional » installation conditions, should not be introduced in ADR unless justified by safety reasons.

In addition, a number of practical difficulties for the installation of retro-reflective markings as specified in Regulation N° 104 were raised during examination of this draft Regulation, i.e. :

Compatibility difficulties in the case of tractor and trailer combinations (Regulation N° 104, Annex 9, § 1.1 would entail fitting on all tractors).

Difficulties due to side and rear configurations of some trailers or tractors.

Reflecting strips are very sensitive to dirt.

The night visibility of these markings is only ensured up to the height corresponding to the light emitted by the headlamps of the approaching vehicle.

Furthermore, retrofitting of markings as proposed in a new marginal 10501(2) is not acceptable.