Proposal to improve and clarify the text of the UN Regulation on Retro-Reflective Devices (RRD)

Submitted by the Informal Working Group on Simplification of Lighting and Light-Signalling Regulations (IWG SLR)*

The text reproduced below was prepared by IWG SLR with the aim to improve and clarify the text of the new UN Regulation on Retro-Reflective Devices (RRD). The modifications are marked in bold for new or strikethrough for deleted characters.

* In accordance with the programme of work of the Inland Transport Committee for 2018–2019 (ECE/TRANS/274, para. 123 and ECE/TRANS/2018/21/Add.1, cluster 3.1), the World Forum will develop, harmonize and update UN Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.
I. Proposal

Paragraph 2.1., amend to read:

"2.1. All the definitions given in the latest series of amendments to UN Regulation No. 48 in force at the time of application for type approval shall apply, unless otherwise specified in this UN Regulation or in the pertinent installation UN Regulations Nos. 53, 74 and 86."

Paragraphs 4.1.6. and 4.1.7., amend to read:

"4.1.6. In case of retro-reflectors

4.1.6.1. Retro-reflective devices may consist of a combined retro-reflecting optical unit and filter, which must be so designed that they cannot be separated under normal conditions of use.

4.1.7.2. The colouring of retro-reflecting optical units and filters by means of paint or varnish is not permitted."

Paragraphs 5.4., amend to read:

"5.4. TECHNICAL REQUIREMENTS CONCERNING RETRO-REFLECTIVE MARKINGS OF THE CLASSES C AND F (SYMBOLS “C” AND “F”)"

Annex 7, amend to read:

"Resistance to water penetration for retro-reflective devices, Advance warning triangles

1. TEST FOR RETRO-REFLECTIVE DEVICES RETRO REFLECTORS AND RETRO-REFLECTIVE MARKINGS

..."

3. TEST FOR MARKING PLATES

3.1. Resistance to water

A section of a sample unit not less than 300 mm long shall be immersed in distilled water at a temperature of 23 ± 5°C for a period of 18 hours; it shall then be left to dry for 24 hours under normal laboratory conditions.

After completion of the test, the section shall be examined. No part inside 10 mm from the cut edge shall show evidence of deterioration which would reduce the effectiveness of the plate."

II. Justification

Paragraph 2.1.

1. Although the wording "unless otherwise specified" is already part of the text, IWG SLR concluded that, for the sake of clarity, it would be appropriate to specify the UN Regulations related to other categories of vehicles in the definition paragraph.

Paragraphs 4.1.6. and 4.1.7.

2. These paragraphs are only applicable to UN Regulation No. 3 Retro-reflectors, not to any other RRD devices.
Paragraph 5.4.
3. The text of paragraph 5.4. refers to Classes C and F while the title, by mistake, only mentions Class C

Annex 7
4. The "Resistance to water test" for UN Regulations Nos. 69 and 70 plates was missing. Paragraph 3 in Annex 7 was copied from UN Regulation No. 70, Annex 8, Paragraph 5.

General
5. If adopted by the Working Party on Lighting and Light-Signalling (GRE) at its eightieth session in October 2018, this proposal may be sent, as an informal document, to the November 2018 session of the World Forum for Harmonization of Vehicle Regulations (WP.29) for consideration together with the formal RRD proposal. In this way, WP.29 will have the possibility to adopt a better text “ab initio” in November 2018.